UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

Honeywell International Inc., Hand Held Products, Inc., & Metrologic Instruments, Inc., **Plaintiffs,** **v.** **Zebra Technologies Corporation,** **Defendants.**	Civil Action No. 6:21-cv-1010 _____ **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Honeywell International Inc. ("Honeywell International"), Hand Held Products, Inc. ("Hand Held"), and Metrologic Instruments, Inc. ("Metrologic") (collectively, "Honeywell") file this Complaint for patent infringement against Defendant Zebra Technologies Corporation ("Zebra"). In support of this action, Honeywell alleges the following:

INTRODUCTION

1. This action for damages and injunctive relief arises under the Patent Laws of the United States, 35 U.S.C. § 271, *et seq*.

THE PARTIES

2. Plaintiff Honeywell International is a Delaware corporation with its principal place of business at 855 S. Mint Street, Charlotte, NC 28202.

3. Plaintiff Hand Held is a Delaware corporation with its principal place of business at 855 S. Mint Street, Charlotte, NC 28202. Hand Held is a wholly owned and controlled subsidiary of Honeywell International.

4. Plaintiff Metrologic is a New Jersey corporation with its principal place of business at 855 S. Mint Street, Charlotte, NC 28202. Metrologic is a wholly owned and controlled subsidiary of Honeywell International.

5. On information and belief, Defendant Zebra Technologies Corporation is a Delaware corporation with its principal place of business at 3 Overlook Point, Lincolnshire, IL 60069.

JURISDICTION AND VENUE

6. The Court has federal question jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action involves a claim arising under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*

7. The Court has personal jurisdiction over Zebra because Zebra has regularly and systematically transacted business in and with the residents of this judicial district, including maintaining at least one physical office in this district at 507 E Howard Lane, Bldg 1, Austin, Texas 78753. *See* Ex. F. On information and belief, Zebra invested more than $2 million to construct its Austin office, which occupies more than 26,000 square ft. *See* Ex. G.

8. On information and belief, Zebra employs a variety of personnel at its Austin location, including individuals with roles in strategy and innovation; engineering; manufacturing; sales; product management; software, electrical, and mechanical compliance; business and IT operations; and data science.

9. On information and belief, Zebra uses its Austin office to conduct work related to handheld devices, mobile computers, and a range of accessories.

10. On information and belief, Zebra's wholly owned subsidiary—Xplore Technologies Corp.—is headquartered in Austin, Texas with numerous Xplore employees living in and around Austin, Texas. *See* Ex. H.

11. Venue is proper in this judicial district for Zebra, pursuant to 28 U.S.C. §§ 1400 and 1391(b) and (c), because Zebra has committed acts of infringement in this judicial district—including selling and distributing infringing products—and because Zebra maintains a regular and established place of business in this judicial district—including its 26,000 square ft. office in Austin, Texas.

THE PATENTS-IN-SUIT

12. Honeywell accuses Zebra of infringing U.S. Patent Nos. 7,527,206 ("the '206 patent"), 9,148,474 ("the '474 patent), 9,578,269 ("the '269 patent"), 9,929,906 ("the '906 patent") and 10,171,767 ("the '767 patent") (collectively, the "Asserted Patents").

13. The '206 patent, titled "Method of Setting the Time Duration of Illumination From an LED-Based Illumination Array Employed in a Digital Imaging-Based Code Symbol Reader, Using an Image-Processing Based Illumination Metering Program Executed Therewithin," issued on May 5, 2009. Xiaoxun Zhu, Yong Liu, Ka Man Au, Rui Hou, Hongpeng Yu, Xi Tao, Liang Liu; Wenhua Zhang, and Anatoly Kotlarsky are the joint inventors of the '206 patent. A certified copy of the '206 patent is attached as Exhibit A.

14. The '767 patent, titled "Image Reader Comprising CMOS Based Image Sensor Array," issued on January 1, 2019. Ynjiun P. Wang and William H. Havens are joint inventors of the '767 patent. A certified copy of the '767 patent is attached as Exhibit B.

15. The '474 patent, titled "Replaceable Connector," issued on September 29, 2015. Matthew Skvoretz is the sole inventor of the '474 patent. A certified copy of the '474 patent is attached as Exhibit C.

16. The '269 patent, titled "Image Reader Comprising CMOS Based Image Sensor Array," issued on February 21, 2017. Ynjiun P. Wang and William H. Havens are joint inventors of the '269 patent. A certified copy of the '269 patent is attached as Exhibit D.

17. The ’906 patent, titled “Data Collection System Having EIR Terminal Interface Node,” issued on March 27, 2018. James Kosecki and Aldo Mario Caballero are joint inventors of the ’906 patent. A certified copy of the ’906 patent is attached as Exhibit E.

18. Each Asserted Patent is presumed valid after receiving a thorough examination by the USPTO. *See* 35 U.S.C. § 282.

19. The Asserted Patents are a reflection of Honeywell’s innovations, and, as described herein, all contain limitations that, either individually or collectively, are directed to inventive concepts that were unconventional and not well known or routine. These inventive concepts, as set forth and claimed in the Asserted Patents, have resulted in immense commercial success of the claimed inventions and the long felt but unsolved needs Honeywell filled with the claimed inventions. In recognition of the innovative nature of the inventions disclosed and claimed in the Asserted Patents, competitors in the relevant industry have sought and obtained licenses to these patents. For example, Honeywell’s products embodying the ’269 and ’767 patents captured the majority of the relevant market in 2007, and Honeywell’s market share was reduced only when competitors—such as Zebra—incorporated the claimed inventions into their products. In many instances this use led to licensing of the Asserted Patents. *See, e.g.*, *Certain Barcode Scanners, Scan Engines, Products Containing The Same, And Components Thereof*, 337-TA-1165, 2020 WL 1504750 (Feb. 27, 2020) (granting joint motion to dismiss based on settlement and license).

20. Honeywell provided Zebra with notice of the Asserted Patents in accordance with 35 U.S.C. § 287. For example, Honeywell provided Zebra with constructive notice of the Asserted Patents by virtually marking its patent-practicing products in a substantially consistent and continuous manner. *See* Ex. YY–EEE.

BACKGROUND

A. Honeywell

21. Honeywell traces its roots to 1904 and an engineer named Mark Honeywell from Wabash, Indiana who developed and installed the first hot-water-heating system in the United States. Honeywell would later play a key role in U.S. war efforts, inventing and manufacturing the first electronic autopilot system. After entering the computer business through a merger with Raytheon Corporation in 1957, Honeywell developed and engineered the instruments that safely landed Neil Armstrong and Buzz Aldrin on the moon.

22. Research is one of the keys to Honeywell's success and provides the necessary cornerstone for its cutting-edge products. As a result of its research and development efforts, Honeywell owns over 27,000 patents. These patents cover a wide range of technologies relating to mobile computers, barcode scanners, wearable technology, human interface devices, and various components thereof.

B. Hand Held

23. Honeywell acquired Hand Held in December 2007. Hand Held now operates as part of Honeywell Safety and Productivity Solutions.

24. Hand Held was founded in Charlotte, North Carolina. It provides barcode reading and image collection solutions for a variety of applications including mobile, wireless, and transaction processing. These products include barcode scanners, computer devices, printers, wearable technology, software, and RFID devices. These devices provide innovative solutions for factories, healthcare and manufacturing facilities, and retail environments. As a result of Hand Held's innovative designs and product features, its products have become commonplace in hospitals and other healthcare facilities because of their reliability, accuracy, and versatility.

25. Hand Held has long been a pioneer in barcode scanning technology. For example, Hand Held developed ground-breaking global-shutter technology in CMOS-based barcode scanners. The global shutter technique allows a barcode scanner to capture all lines of the barcode simultaneously, instead of just one by one. Products incorporating Honeywell's patented global shutter technique were—and still are—far superior to scan engines utilizing a rolling shutter, resulting in significant commercial success for Honeywell's global-shutter products.

26. As a result of its research and development efforts, Hand Held owns about 1,900 patents. These patents cover a wide range of technologies relating to mobile computers, barcode scanners, wearable technology, human interface devices, and various components thereof.

C. Metrologic

27. Honeywell acquired Metrologic in July 2008. Metrologic operates alongside Hand Held as part of Honeywell Safety and Productivity Solutions.

28. Metrologic was founded in 1968 and developed the first hand-held laser barcode scanner, known as the X-scanner, in the 1970s. Metrologic is an industry leader in data capture and collection hardware and software. During the birth of the Universal Product Code, Metrologic introduced triggerless, omnidirectional, and mini-slot scanners into the retail market to help read and decode these new barcodes. Since these breakthroughs, Metrologic's technologies have included barcode computing, software for barcode scanners optimization, and wireless communication network infrastructure.

29. As a result of its research and development efforts, Metrologic owns about 300 patents. These patents cover a wide variety of technologies in the areas of laser and imaging technologies.

ZEBRA'S INFRINGING ACTIVITIES

30. Zebra is a direct competitor of Honeywell. *See, e.g.*, Ex. QQ–XX (internal Zebra Selling Guides comparing Honeywell's products to Zebra's products).

31. Zebra has infringed and continues to infringe on Honeywell's valuable and proprietary intellectual property, including at least the Asserted Patents. Zebra is using Honeywell's patented technology without a license or Honeywell's permission.

32. According to Zebra, it manufactures, sells, and offers for sale products and services related to "Barcode Printing, Mobile Computing, Data Capture, Locationing, Data Platforms, Software, Services, Supplies." Ex. I at 2. Zebra also purports to be "#1 by market share" for "Enterprise Mobile Computing" and "Barcode Scanning." Ex. J at 1.

33. Zebra had actual knowledge of all Asserted Patents and of Honeywell's infringement allegations at least as early as the filing of this Complaint.

34. Zebra's actions are at least objectively reckless as to the risk of infringing a valid patent and this objective risk was either known or should have been known by Zebra.

35. Upon information and belief, Zebra has actively monitored Honeywell's patent-marked products since as early as 2015 as part of its ordinary course of business, and Zebra views at least some of those products to be in direct competition with at least some of Zebra's Accused Products. *See, e.g.*, Ex. QQ–XX (internal Zebra Selling Guides comparing Honeywell's products to Zebra's products).

36. Zebra's infringing barcode scanning products include at least Zebra's CC5000-10, CC600, CC6000, CS3000, CS4070, CS4070-HC, CS6080, CS6080-HC, DS2200, DS2208, DS2278, DS3508, DS3578, DS3600, DS3608, DS3608-DP, DS3608-ER, DS3608-HD, DS3608-HP, DS3608-SR, DS3678, DS3678-DP, DS3678-ER, DS3678-HD, DS3678-HP, DS3678-SR, DS4208, DS4308, DS457, DS4600, DS4608-DPE, DS4608-HD, DS4608-SR, DS4608-HC,

DS4800-HC, DS6607, DS6608, DS6700, DS6707, DS6808, DS6878, DS7708, DS8100, DS8108, DS8108-HC, DS8178, DS8178-HC, DS9208, DS9308, DS9808, DS9908, DS9908-HD, DS9908R, DS9908R-HD, LI2208, LI3608, LI3608-ER, LI3608-SR, LI3678-ER, LI3678-SR, LI4278, LS1203, LS1203-HD, LS2208, LS3008, LS3408, LS3578, LS4208, LS4278, LS7708, LS7808, LS9203i, LS9208i, M60-200904, MK3100, MK500, MP6000, MP7000, MS954, PS20, RFD2000, RFD8500, RS4000, RS419, RS5000, RS507X, RS5100, and RS6000 (collectively, Zebra's "Infringing Barcode Scanners").

37. On information and belief, Zebra began marketing and selling certain Infringing Barcode Scanners for sale at least as early as 2015.

38. Zebra's infringing mobile computing products include at least Zebra's EC30, EC50, EC55, ET51, ET56, ET5X-10SCN5-02, MC2100, MC2180, MC2200, MC2700, MC3200, MC3300, MC3300x, MC3330R, MC3330xR, MC3390R, MC3390xR, MC67, MC9200, MC9300, MT2070, MT2090, RS6000, TC21, TC21-HC, TC26, TC26-HC, TC51, TC51-HC, TC52, TC52-HC, TC52X, TC52x-HC, TC56, TC57, TC57X, TC70, TC72, TC75, TC77, TC8000, TC8300, XPAD L10, XPAD L10 ATEX, XSLATE B10/D10 Barcode Reader Module, and XSLATE R12 (collectively, Zebra's "Infringing Mobile Computers").

39. On information and belief, Zebra began marketing and selling certain Infringing Mobile Computers for sale at least as early as 2015.

40. Zebra's infringing scan engines include at least Zebra's SE4750, SE4750 DPM, SE4750SR, and SE4770 (collectively, Zebra's "Infringing Scan Engines").

41. On information and belief, Zebra began marketing and selling certain Infringing Scan Engines for sale at least as early as 2015.

42. Zebra's Infringing Barcode Scanners, Infringing Mobile Computers, and Infringing Scan Engines are collectively the "Accused Products."

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 7,527,206

43. Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

44. The '206 patent is valid and enforceable.

45. Metrologic owns the entire right, title, and interest to the '206 patent.

46. Zebra has directly infringed and continues to directly infringe at least claim 20 of the '206 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that embody the inventions disclosed in the '206 patent, including Zebra's DS8108.

47. Zebra's DS8108 is a digital-imaging based code symbol reading system including a housing having a light transmission window.

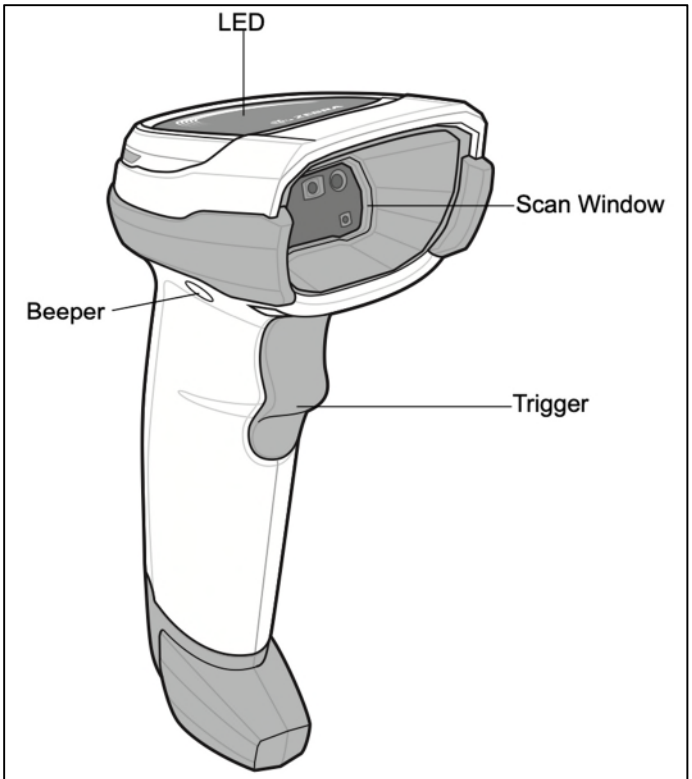


Figure 3-1 *Parts of the DS8108*

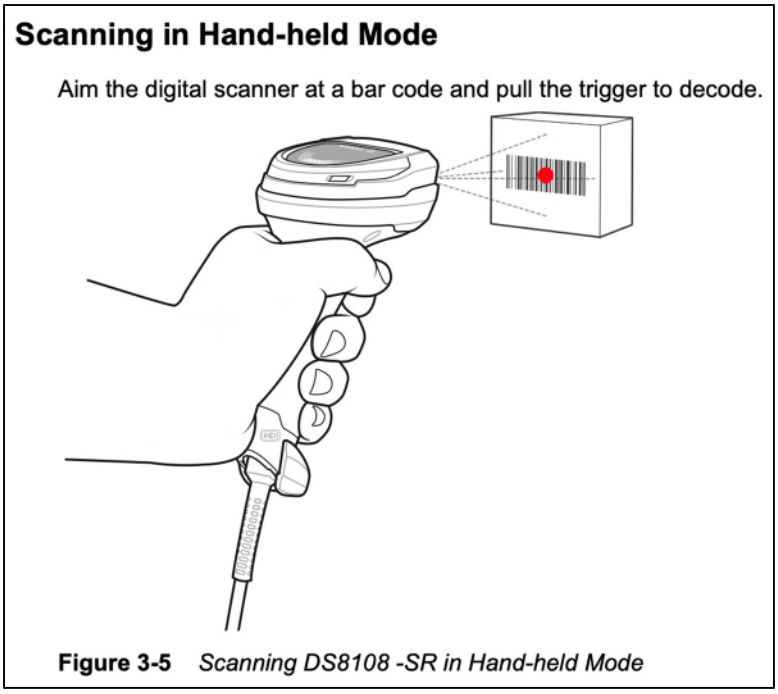
Ex. EE (DS8108 Reference Guide) at 35.

48. Zebra's DS8108 includes an image formation and detection subsystem having an image sensing array and image formation optics having a field of view (FOV) defined relative to said light transmission window.

Performance Characteristics	
Light Source	
DS8108-SR	Aiming pattern: 617 nm LED / Illumination: 660 nm LEDs
DS8108-HC	Aiming pattern: 528 nm LED/ Illumination: Warm white LEDs
DS8108-DL	Aiming pattern: 617 nm LED / Illumination: 660 nm LEDs
Illumination	
DS8108-SR/DL	Two 645nm red LEDs
DS8108-HC	Two warm white LEDs
Field of View (Horizontal x Vertical) Nominal	48° H x 37° V
Image Sensor	1,280 x 960 pixels

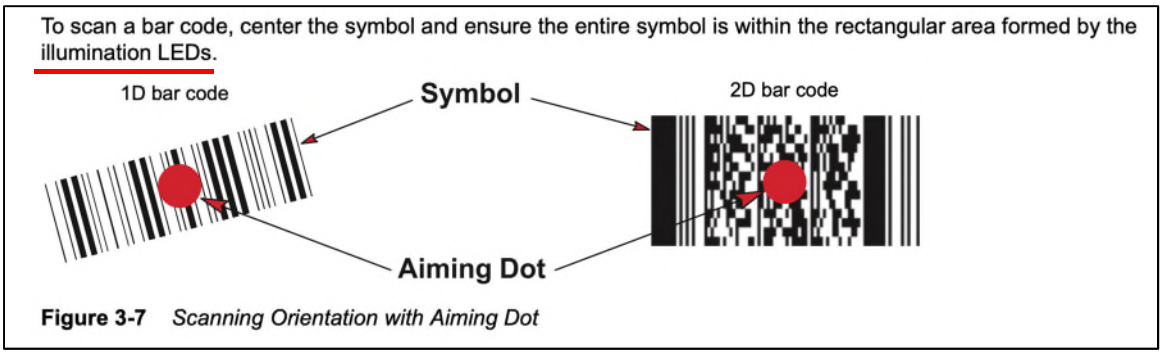
Ex. EE (DS8108 Reference Guide) at 59.

49. Zebra's DS8108 includes a trigger switch integrated with said housing, for generating a trigger event in response to an operator manually-actuating said trigger switch when an object is presented within said FOV for digital imaging.

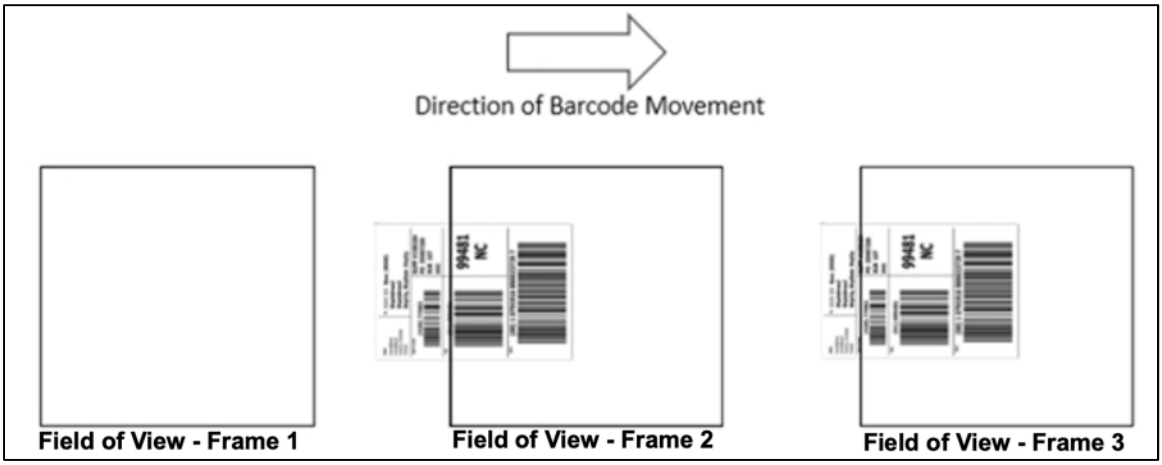


Ex. EE (DS8108 Reference Guide) at 41.

50. Zebra's DS8108 includes an illumination subsystem, disposed in said housing, and having with an LED-based illumination array for producing a field of illumination with said FOV during object illumination and imaging operations.



Ex. EE (DS8108 Reference Guide) at 41.



Ex. EE (DS8108 Reference Guide) at 384.

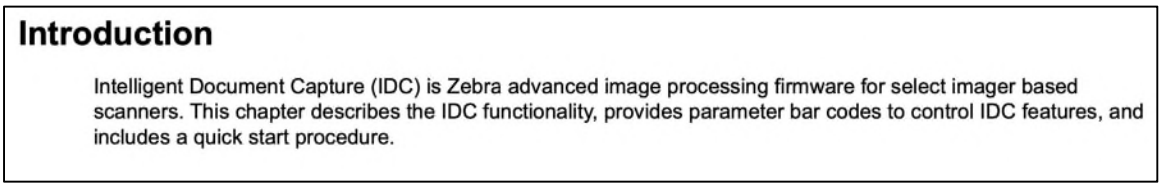
51. On information and belief, Zebra's DS8108 includes an illumination measurement subsystem, disposed in said housing, for automatically measuring the level of illumination at a particular region of said FOV during object illumination and imaging operations, and determining and storing an illumination duration necessary to achieve a desired spatial intensity in a digital image to be formed and detected by said information and detection subsystem; an illumination control subsystem, disposed in said housing, and using said illumination duration determined by said illumination measurement subsystem so as to control the time duration that said LED-based illumination array is driven during object illumination and imaging operations.

52. Zebra's DS8108 includes a programmed image processor, disposed in said housing, and supporting an image-processing based illumination metering program, and decode processing of one or more digital images formed and detected by said image formation and detection subsystem so as to read one or more 1D and/or 2D code symbols represented in said digital images.

Symbol Decode Capability	
1D	Code 39, Code 128, Code 93, Codabar/NW7, Code 11, MSI, UPC/EAN, I 2 of 5, Korean 3 of 5, GS1 DataBar, Base 32 (Italian Pharma)
2D	PDF417, Micro PDF417, Composite Codes, TLC-39, Aztec, Data Matrix, MaxiCode, QR Code, Micro QR, Han Xin, Postal Codes

Ex. EE (DS8108 Reference Guide) at 60.

53. Zebra's DS8108 includes a system control subsystem, disposed in said housing, for controlling and/or coordinating the operations of one or more of said subsystems and components identified above.



Introduction

Intelligent Document Capture (IDC) is Zebra advanced image processing firmware for select imager based scanners. This chapter describes the IDC functionality, provides parameter bar codes to control IDC features, and includes a quick start procedure.

Ex. EE (DS8108 Reference Guide) at 359; *see also id.* at 541 ("operating system").

54. Zebra also indirectly infringed and continues to indirectly infringe at least claim 20 of the '206 patent with knowledge or by being willfully blind that its actions constitute infringement, at least as of the filing of this Complaint.

55. On information and belief, Zebra had knowledge of or was willfully blind to the '206 patent before Honeywell filed this suit. In fact, the Patent Office cited to U.S. Patent Publication No. 2008/0135620—an application in the same patent family as the '206 patent—in an office action rejection of U.S. Patent Application No. 11/739,888, which is an application assigned to Zebra's wholly owned and controlled subsidiary, Symbol Technologies, Inc. *See* Ex. K. U.S. Patent No. 7,240,844—a patent in the same family as the '206 patent—also was discussed in detail in an international search report for PCT/US2009/038330, which is an application also assigned to Zebra's wholly owned and controlled subsidiary, Symbol Technologies, Inc. *See* Ex. L.

56. Zebra has induced and continues to induce infringement of the '206 patent by providing information and instruction on using the Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities, *e.g.*, Ex. SS–TT (TC75 Selling

Guide), VV (DS8100 Selling Guide); (ii) the instructions and information contained in Zebra's product guides and instructional materials; *e.g.*, Ex. X–Z (TC75), EE–GG(DS8108); and (iii) instructional videos published by Zebra on YouTube, e.g., *Zebra DS8100: How to Set Up Your Scanner For Document Capture* (Jan. 18, 2018), https://www.youtube.com/watch?v=0RzV1Fhl6q4&t=10s. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology. *See, e.g.*, Ex. QQ–XX.

57. Zebra contributes to infringement of the '206 patent by others by manufacturing, marketing, and selling the Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

58. Despite its knowledge of the '206 patent, Zebra infringed and continues to infringe that patent. Accordingly, Zebra's infringement has been willful.

59. As a result of Zebra's infringement of the '206 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

60. Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

61. Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

COUNT II
INFRINGEMENT OF U.S. PATENT NO. 9,148,474

62. Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

63. The ’474 patent is valid and enforceable.

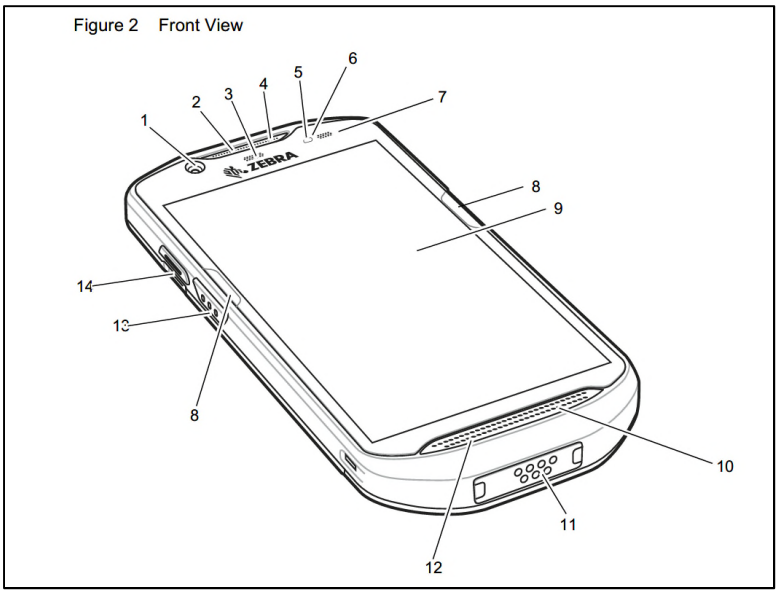
64. Hand Held owns the entire right, title, and interest to the ’474 patent.

65. Zebra has directly infringed and continues to directly infringe at least claim 1 of the ’474 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that embody the inventions disclosed in the ’474 patent, including Zebra’s TC52 mobile computing product.

66. Zebra’s TC52 mobile computing product includes an interface connector that facilitates the use of a TC52 product with a docking station (also known as a ShareCradle), such as the CRD-TC51-1SCU-01, shown below:

Ex. NN (Zebra TC5X Accessories Guide).

67. The interface connector includes a connector body and multiple connector pads, each pad having an external surface configured to electrically connect to corresponding contacts in the docking station as shown in the photo below in which the interface connector is numbered as 11 and which illustrates seven circular external surfaces of seven connector pads:



Ex. OO (TC52 User Guide) at 17.

68. The interface connector includes a releasable attachment mechanism that allows the interface connector to be attached to and detached from the TC52 as discussed in the TC52 Integrator's Guide in the excerpt shown below:

Charging the Device

To charge a device:

NOTE: If the device has a Rugged Boot, remove the cup insert before inserting the device. By default, the device includes an interface connector. If the interface connector is removed for USB Type C cable connectivity, then it must be replaced before charging or receiving an Ethernet IP address if placed in a cradle.

1. Insert the device into the slot to begin charging.

Ex. PP (TC52 Integrator Guide) at 33 (emphasis added).

69. The interface connector detached from the TC52 using a pair of needle nose pliers:

Zebra Mobility DNA: It's a Zebra Android Tool–StageNow, at 33 seconds (Nov. 28, 2017), https://www.youtube.com/watch?v=hKvNdef_TQY.

70. This combination of features infringes at least claim 1 of the '474 patent.

71. Zebra also indirectly infringed and continues to indirectly infringe at least claim 1 of the '474 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

72. Zebra has induced and continues to induce infringement of the '474 patent by providing information and instruction on using the Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities, *e.g.*, Ex. SS–TT (TC75 Selling Guide), VV (DS8100 Selling Guide); (ii) the instructions and information contained in Zebra's product guides and instructional materials; *e.g.*, Ex. X–Z (TC75), EE–GG (DS8108); and (iii) instructional videos published by Zebra on YouTube, e.g., *Zebra Mobility DNA: It's a Zebra Android Tool–StageNow* (Nov. 28, 2017), https://www.youtube.com/watch?v=hKvNdef_TQY. Zebra knew its activities were inducing infringement at least through actively comparing its

products to Honeywell's products and copying Honeywell's patented technology. *See, e.g.*, Ex. QQ–XX.

73. Honeywell also has consistently and continuously marked its products with the '474 patent since at least 2020. *See* Ex. DDD–EEE. And, upon information and belief, Zebra tracks Honeywell's products, including producing internal marketing materials directly comparing Zebra's products to Honeywell's products, including those consistently and continuously marked with the '474 patent. *See* Ex. QQ (TC52/TC57 Selling Guide); Ex. SS–TT (TC75 Selling Guide); Ex. UU (DS3600 Series Selling Guide); Ex. VV (DS8100 Selling Guide); Ex. XX (MC9300 Series Selling Guide).

74. Zebra contributes to infringement of the '474 patent by others by manufacturing, marketing, and selling the Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

75. Despite its knowledge of the '474 patent, Zebra infringed and continues to infringe the '474 patent. Accordingly, Zebra's infringement was willful.

76. As a result of infringement of the '474 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

77. Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

78. Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

COUNT III
INFRINGEMENT OF U.S. PATENT NO. 9,578,269

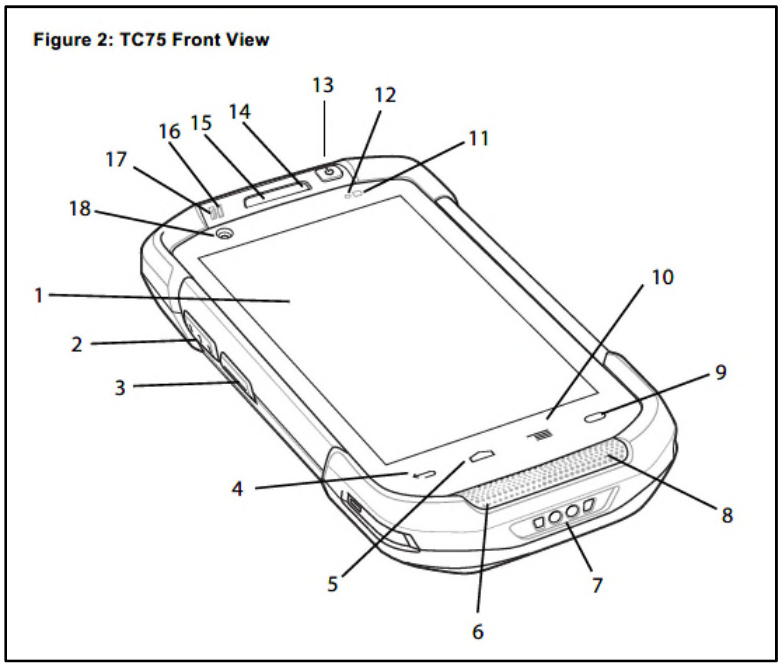
79. Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

80. The ’269 patent is valid and enforceable.

81. Hand Held owns the entire right, title, and interest to the ’269 patent.

82. Zebra has directly infringed and continues to directly infringe at least claim 1 of the ’269 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that embody the inventions disclosed in the ’269 patent, including Zebra’s TC75 and Zebra’s DS8108.

83. To the extent the preamble is limiting, Zebra’s TC75 is a barcode reading device:



Ex. Y (TC75 User Guide) at 18.

Imaging

The TC75 with an integrated imager has the following features:

- Omnidirectional reading of a variety of bar code symbologies, including the most popular linear, postal, PDF417, and 2D matrix code types.
- The ability to capture and download images to a host for a variety of imaging applications.
- Advanced intuitive laser aiming cross-hair and dot aiming for easy point-and-shoot operation.

The imager uses imaging technology to take a picture of a bar code, stores the resulting image in its memory, and executes state-of-the-art software decoding algorithms to extract the bar code data from the image.

Ex. Y (TC75 User Guide) at 109.

84. Zebra's TC75 includes an SE4750 scan engine imager comprising a plurality of pixels in a two-dimensional array:

2D Imager Engine (SE4750-SR) Specifications	
Field of View	Horizontal - 48.0° Vertical - 36.7°
Image Resolution	1280 horizontal X 960 vertical pixels

Ex. Y (TC75 User Guide) at 191.

85. The SE4750 imager in the TC75 includes, upon information and belief, an AR0134 image sensor which is operable, in a global shutter mode, to collect image data comprising at least a representation of a two-dimensional barcode from a target:

2D Imager Engine (SE4750-SR) Specifications	
Field of View	Horizontal - 48.0° Vertical - 36.7°
Image Resolution	1280 horizontal X 960 vertical pixels

Ex. Y (TC75 User Guide) at 191.

Related Documents

- *PL3307 Decoder Integration Guide*, p/n 72E-149624-xx
- *The I²C-Bus Specification, Version 2.1*, http://www.semiconductors.philips.com/acrobat/literature/9398/39340011.pdf
- *Aptina AR0134 (mono) 1/3-inch CMOS Digital Image Sensor Datasheet,* http://www.aptina.com To receive a copy of this datasheet, register with Aptina at: http://www.aptina.com/extranet/register.jsp
- *Molex connector specification*, *54809 Series*, http://www.molex.com
- *Kyocera connector specification*, *6283 Series*, http://global.kyocera.com

Ex. DD (SE4750 Integration Guide) at 12.

Pixel Array Structure

The AR0134CS pixel array is configured as 1412 columns by 1028 rows, (see Figure 2). The dark pixels are optically black and are used internally to monitor black level. Of the right 108 columns, 64 are dark pixels used for row noise correction. Of the top 24 rows of pixels, 12 of the dark rows are used for black level correction. There are 1296 columns by 976 rows of optically active pixels. While the sensor's format is 1280 × 960, the additional active columns and active rows are included for use when horizontal or vertical mirrored readout is enabled, to allow readout to start on the same pixel. The pixel adjustment is always performed for monochrome or color versions. The active area is surrounded with optically transparent dummy pixels to improve image uniformity within the active area. Not all dummy pixels or barrier pixels can be read out.

Ex. AA (AR0134 Datasheet) at 4.

86. In the global shutter mode of Zebra's TC75—containing a SE4750 imager—all or substantially all of the plurality of pixels in the CMOS image sensor are configured to be simultaneously exposed in response to an exposure control timing pulse to enable the collection of image data in the form of a one-dimensional barcode and a two-dimensional barcode:

> User interaction with the sensor is through the two-wire serial bus, which communicates with the array control, analog signal chain, and digital signal chain. The core of the sensor is a 1.2 Mp Active-Pixel Sensor array. The AR0134CS features global shutter technology for accurate capture of moving images. The exposure of the entire array is controlled by programming the integration time by register setting. All rows simultaneously integrate light prior to readout. Once a row has been read, the data from the columns is sequenced through an analog signal chain (providing offset correction and gain), and then through an analog-to-digital converter (ADC). The output from the ADC is a 12-bit value for each pixel in the array. The ADC output passes through a digital processing signal chain (which provides further data path corrections and applies digital gain). The pixel data are output at a rate of up to 74.25 Mp/s, in parallel to frame and line synchronization signals.

Ex. AA (AR0134 Datasheet) at 3. See also the AR0134 Datasheet that includes a block diagram of the architecture of the AR0134 image sensor, including a "Timing and Control" block:

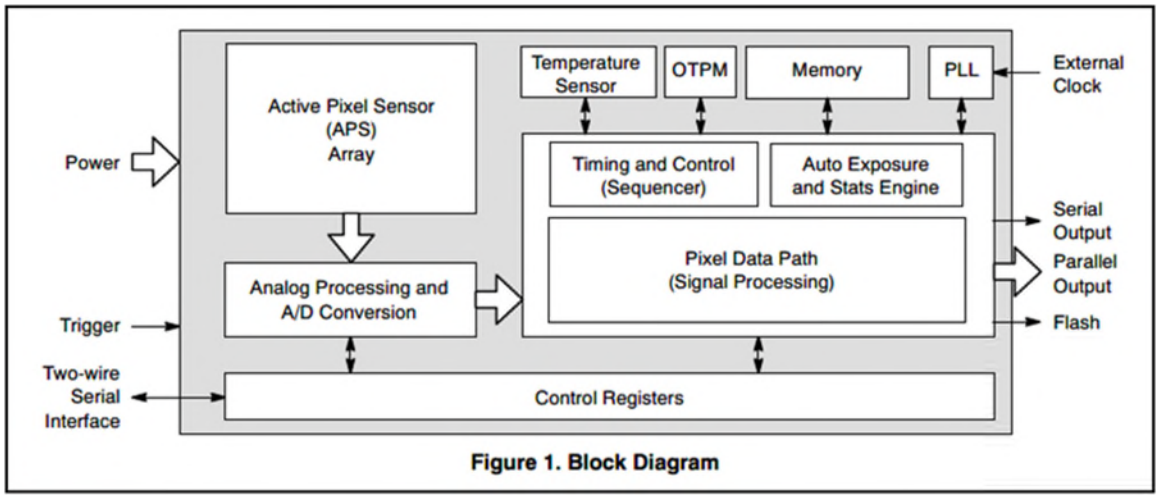


Figure 1. Block Diagram

Ex. AA (AR0134 Datasheet) at 3.

87. Zebra's TC75 contains a processor:

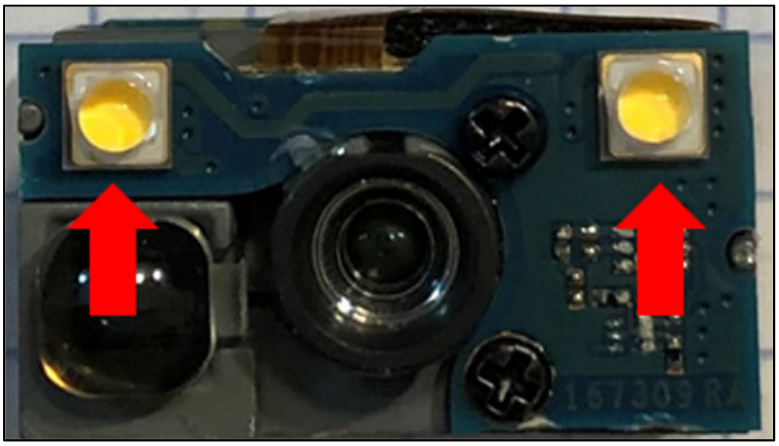
Performance Characteristics	
CPU	1.7 GHz dual-core.
Operating System	Android-based AOSP V4.4.3
Memory	1 GB RAM/8 GB Flash
Output Power	USB - 5 VDC @ 500 mA max

Ex. Y (TC75 User Guide) at 190; *see also* Ex. Z (TC70X/TC75X User Guide) at 223.

88. Zebra's TC75 contains at least one illumination light source configured to illuminate at least a portion of the target:

Illumination System	LEDs: Warm white LED Pattern Angle: 80° at 505 intensity

Ex. Y (TC75 User Guide) at 191. *See also* annotated image of scan engine from TC75 annotated with red arrows to identify LEDs.



89. Zebra's TC75's processor is configured to coordinate an exposure control timing pulse and an illumination control timing pulse such that the illumination control timing pulse is transmitted to the at least one illumination light source as a result of the exposure control timing pulse and the illumination light source responds by illuminating the target:

FRAME_VALID and LINE_VALID signals are output on dedicated pins, along with a synchronized pixel clock. A dedicated FLASH pin can be programmed to control external LED or flash exposure illumination.

Ex. AA (AR0134 Datasheet) at 2.

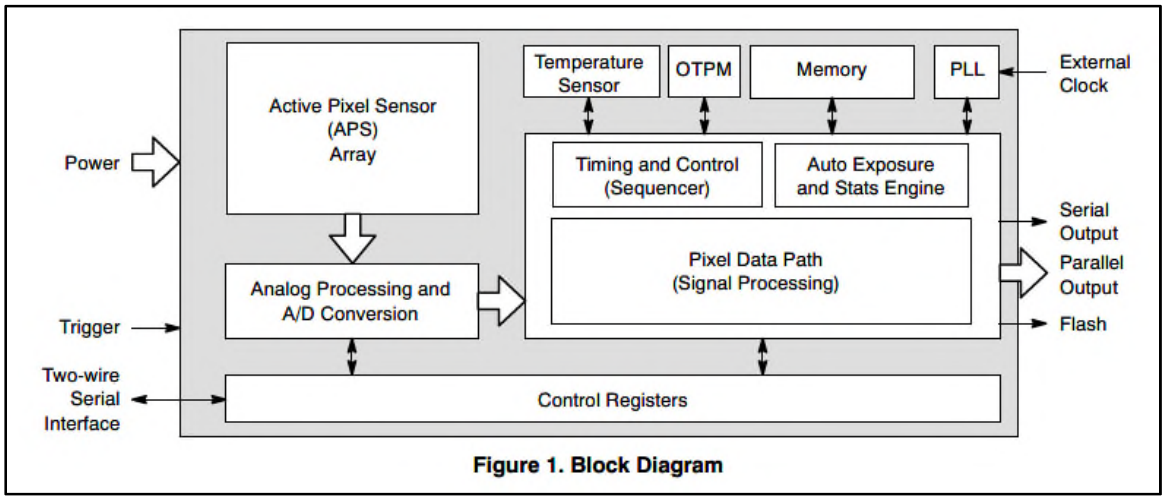


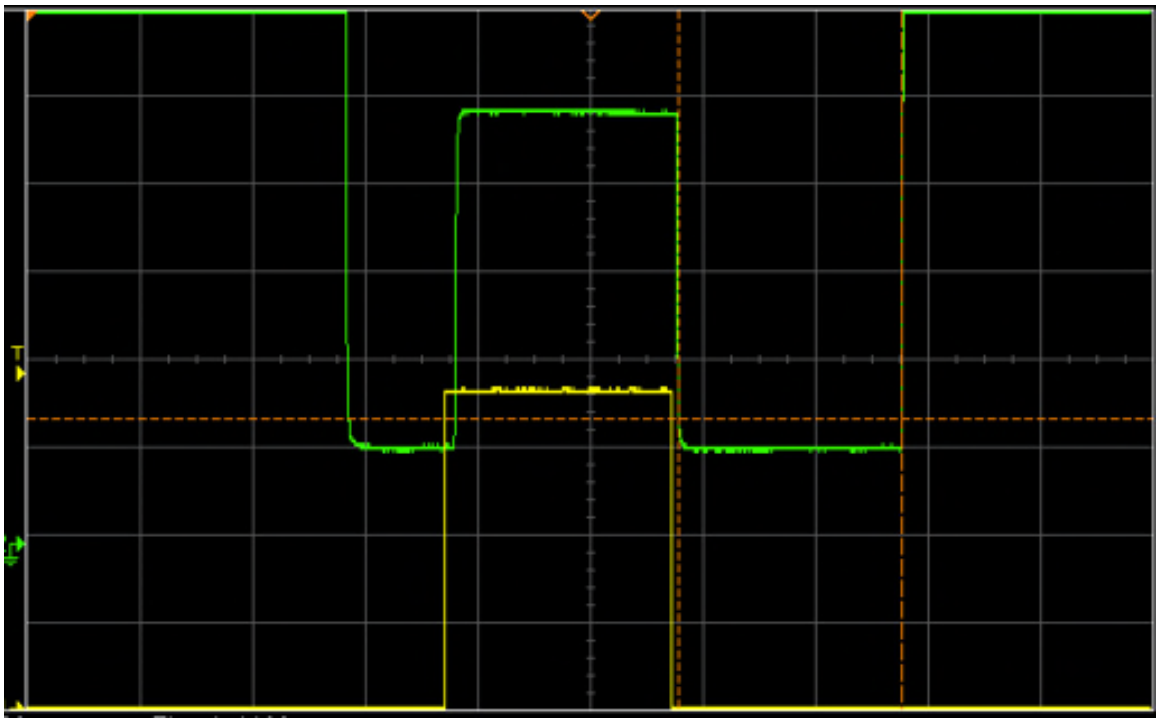
Figure 1. Block Diagram

Ex. AA (AR0134 Datasheet) at 3. The AR0134 Developer Guide states that the Flash output signal indicates when exposure of the AR0134 imaging sensor takes place.

Exposure Indicator

The AR0134 provides an output pin, FLASH, to indicate when the exposure takes place. When R0x3046[8]is set, FLASH is HIGH during exposure. By using R0x3046[7], the polarity of the FLASH pin can be inverted.

Ex. BB (AR0134 Developer Guide) at 17. See also testing data for the SE4750 showing illumination (in green) and exposure (in yellow):



90. Zebra's TC75 contains a non-transitory memory including computer program instructions:

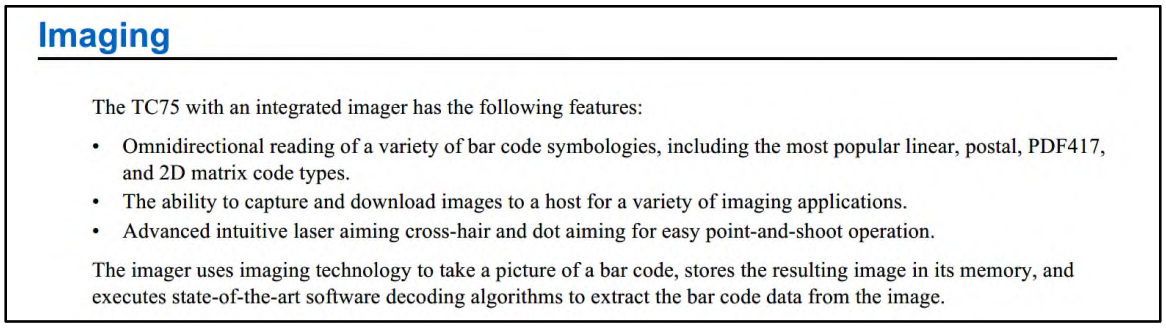
Performance Characteristics	
CPU	1.7 GHz dual-core.
Operating System	Android-based AOSP V4.4.3
Memory	1 GB RAM/8 GB Flash
Output Power	USB - 5 VDC @ 500 mA max

Ex. Y (TC75 User Guide) at 190.

Performance Characteristics	
CPU	1.8 GHz hex core 64 bit processor (Snapdragon 650)
Operating System	Android 8.1 Oreo
Memory	4 GB RAM/32 GB Flash
Output Power	USB - 5 VDC @ 500 mA max
User Environment	
Operating Temperature	-20°C to 50°C (-4°F to 122°F)

Ex. Z (TC70X/TC75X User Guide) at 221.

91. The non-transitory memory and the computer program instructions in Zebra's TC75 are configured to, when executed by the processor, cause the apparatus to search the image data collected in the global shutter mode for one or more markers indicative of a presence of at least one barcode symbol:



Imaging

The TC75 with an integrated imager has the following features:

- Omnidirectional reading of a variety of bar code symbologies, including the most popular linear, postal, PDF417, and 2D matrix code types.
- The ability to capture and download images to a host for a variety of imaging applications.
- Advanced intuitive laser aiming cross-hair and dot aiming for easy point-and-shoot operation.

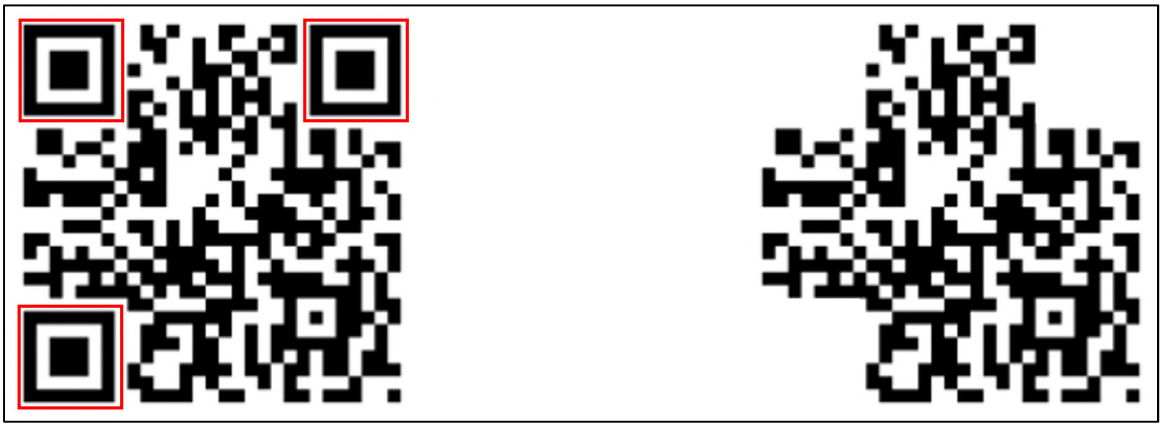
The imager uses imaging technology to take a picture of a bar code, stores the resulting image in its memory, and executes state-of-the-art software decoding algorithms to extract the bar code data from the image.

Ex. Y (TC75 User Guide) at 109; *see also, e.g.*, Ex. Z (TC70X/TC75X User Guide) at 122.

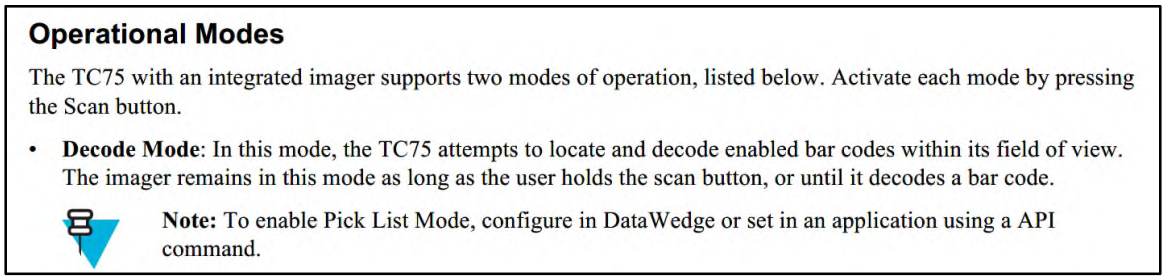
92. To confirm that the TC75 searches for markers, two 1D UPC-A barcodes as shown below were scanned by the TC75, with the only difference between them being that the barcode on the left included the marker indicated by the red box while the marker was removed from the barcode on the barcode on the right. The TC75 was able to decode the barcode on the left, but not the barcode on the right.

93. The same test was repeated for the 2D barcodes (QR codes) shown below, which again are identical except that the barcode on the left includes the three markers indicated by the

red boxes while those markers were removed from the barcode on the right. Again, the TC75 was able to decode the barcode on the left, but not the barcode on the right.



94. The non-transitory memory and the computer program instructions in Zebra's TC75 are configured to, when executed by the processor, cause the apparatus to, in an instance in which at least one marker of the one or more markers is detected, decode the image data based on the at least one marker:



Operational Modes

The TC75 with an integrated imager supports two modes of operation, listed below. Activate each mode by pressing the Scan button.

- **Decode Mode**: In this mode, the TC75 attempts to locate and decode enabled bar codes within its field of view. The imager remains in this mode as long as the user holds the scan button, or until it decodes a bar code.

Note: To enable Pick List Mode, configure in DataWedge or set in an application using a API command.

Ex. Y (TC75 User Guide) at 109.

95. To the extent the preamble is limiting, Zebra's DS8108 is barcode reading device:

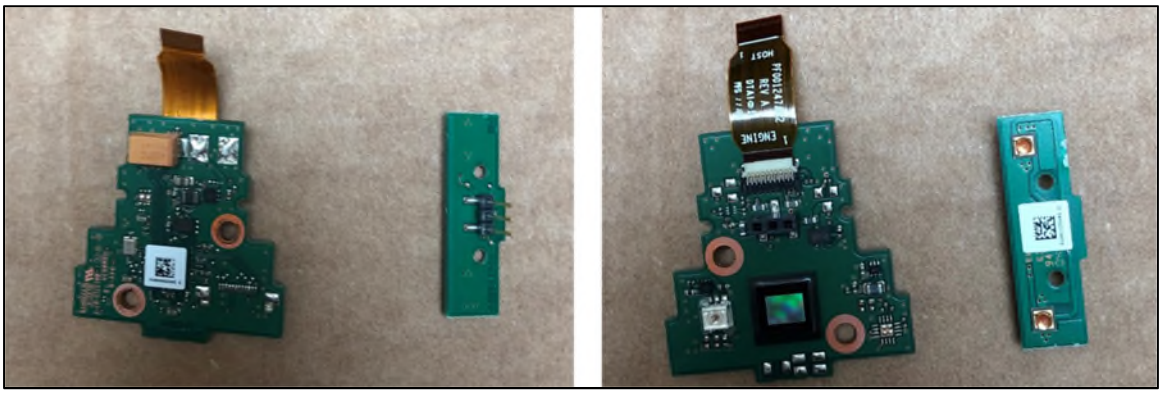
Ex. FF (DS8100 Datasheet) at 1.

Decode Mode

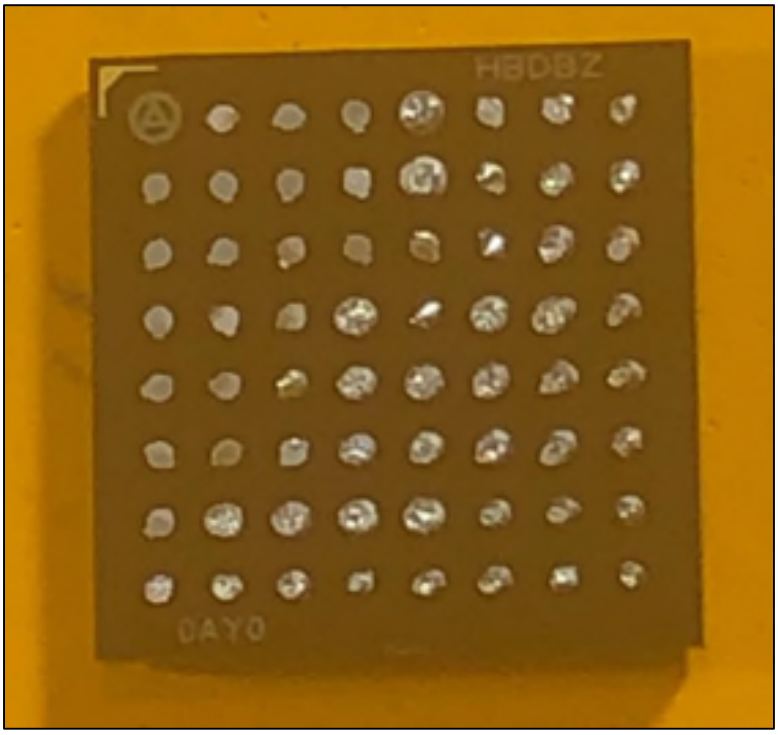
By default, when you press the trigger the imager attempts to locate and decode enabled bar codes within its field of view. The imager remains in this mode until it decodes a bar code or you release the trigger.

Ex. EE (DS8108 Reference Guide) at 10-4.

96. Zebra's DS8108 includes a CMOS image sensor comprising a plurality of pixels in a two-dimensional array, as shown in the following teardown images of Zebra's DS8108:



97. Zebra's DS8108 contains an AR0134 image sensor, which is operable, in a global shutter mode, to collect image data comprising at least a representation of a two-dimensional barcode from a target:



Pixel Array Structure

The AR0134CS pixel array is configured as 1412 columns by 1028 rows, (see Figure 2). The dark pixels are optically black and are used internally to monitor black level. Of the right 108 columns, 64 are dark pixels used for row noise correction. Of the top 24 rows of pixels, 12 of the dark rows are used for black level correction. There are 1296 columns by 976 rows of optically active pixels. While the sensor's format is 1280 × 960, the additional active columns and active rows are included for use when horizontal or vertical mirrored readout is enabled, to allow readout to start on the same pixel. The pixel adjustment is always performed for monochrome or color versions. The active area is surrounded with optically transparent dummy pixels to improve image uniformity within the active area. Not all dummy pixels or barrier pixels can be read out.

Ex. AA (AR0134 Data Sheet) at 4.

> **AR0134CS**
>
> **Description**
>
> The AR0134CS from ON Semiconductor is a 1/3−inch 1.2 Mp CMOS digital image sensor with an active-pixel array of 1280 (H) x 960 (V). It is designed for low light performance and features a global shutter for accurate capture of moving scenes. It includes sophisticated camera functions such as auto exposure control, windowing, scaling, row skip mode, and both video and single frame modes. It is programmable through a simple two-wire serial interface. The AR0134CS produces extraordinarily clear, sharp digital pictures, and its ability to capture both continuous video and single frames makes it the perfect choice for a wide range of applications, including scanning and industrial inspection.

Ex. AA (AR0134 Data Sheet) at 1.

98. In the global shutter mode of Zebra's DS8108—containing an AR0134 image sensor—all or substantially all of the plurality of pixels in the CMOS image sensor are configured to be simultaneously exposed in response to an exposure control timing pulse that enables the collection of image data in the form of one-dimensional and two-dimensional barcodes:

> User interaction with the sensor is through the two-wire serial bus, which communicates with the array control, analog signal chain, and digital signal chain. The core of the sensor is a 1.2 Mp Active-Pixel Sensor array. The AR0134CS features global shutter technology for accurate capture of moving images. The exposure of the entire array is controlled by programming the integration time by register setting. All rows simultaneously integrate light prior to readout. Once a row has been read, the data from the columns is sequenced through an analog signal chain (providing offset correction and gain), and then through an analog-to-digital converter (ADC). The output from the ADC is a 12-bit value for each pixel in the array. The ADC output passes through a digital processing signal chain (which provides further data path corrections and applies digital gain). The pixel data are output at a rate of up to 74.25 Mp/s, in parallel to frame and line synchronization signals.

Ex. AA (AR0134 Datasheet) at 3. See also the AR0134 Datasheet that includes a block diagram of the architecture of the AR0134 image sensor, including a "Timing and Control" block:

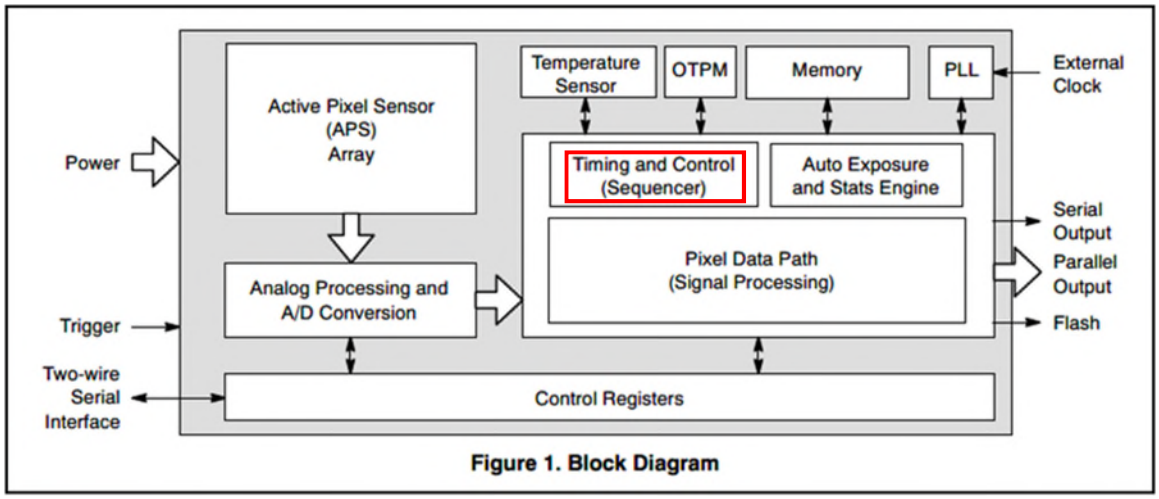


Figure 1. Block Diagram

Ex. AA (AR0134 Datasheet) at 3.

99. Zebra's DS8108 contains a processor:

> **Unparalleled performance on virtually every barcode in any condition**
> Only the DS8100 Series combines the power of an 800 MHz microprocessor, a high-resolution megapixel sensor and Zebra's exclusive PRZM Intelligent Imaging technology. With this unique combination of hardware and advanced algorithms, the DS8100 Series instantly captures the most problematic barcodes — including dense, poorly printed, crinkled, faded, distorted, dirty or damaged, as well as electronic barcodes on dimly lit displays.

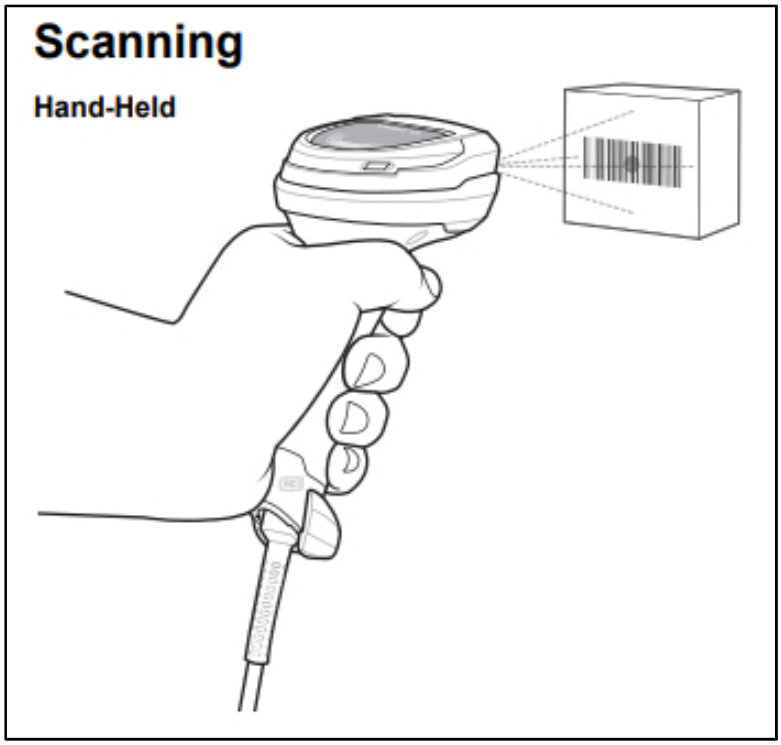
Ex. FF (DS8100 Datasheet) at 1.

100. Zebra's DS8108 contains at least one illumination light source, two 645 nm red LEDs, configured to illuminate at least a portion of the target:

Performance Characteristics	
Light Source	Aiming Pattern: circular 617nm amber LED
Illumination	(2) 645nm red LEDs
Imager Field of View	48° H x 37° V nominal
Image Sensor	1,280 x 960 pixels
Minimum Print Contrast	16% minimum reflective difference
Skew/Pitch Roll Tolerance	+/- 60°; +/- 60°; 0-360°

Ex. FF (DS8100 Datasheet) at 3.

101. Zebra's DS8108's processor is configured to coordinate an exposure control timing pulse and an illumination control timing pulse such that the illumination control timing pulse is transmitted to the at least one illumination light source as a result of the exposure control timing pulse and the illumination light source responds by illuminating the target:



Ex. GG (DS8108 Quick Start Guide) at 3.

> FRAME_VALID and LINE_VALID signals are output on dedicated pins, along with a synchronized pixel clock. A dedicated FLASH pin can be programmed to control external LED or flash exposure illumination.

Ex. AA (AR0134 Datasheet) at 2.

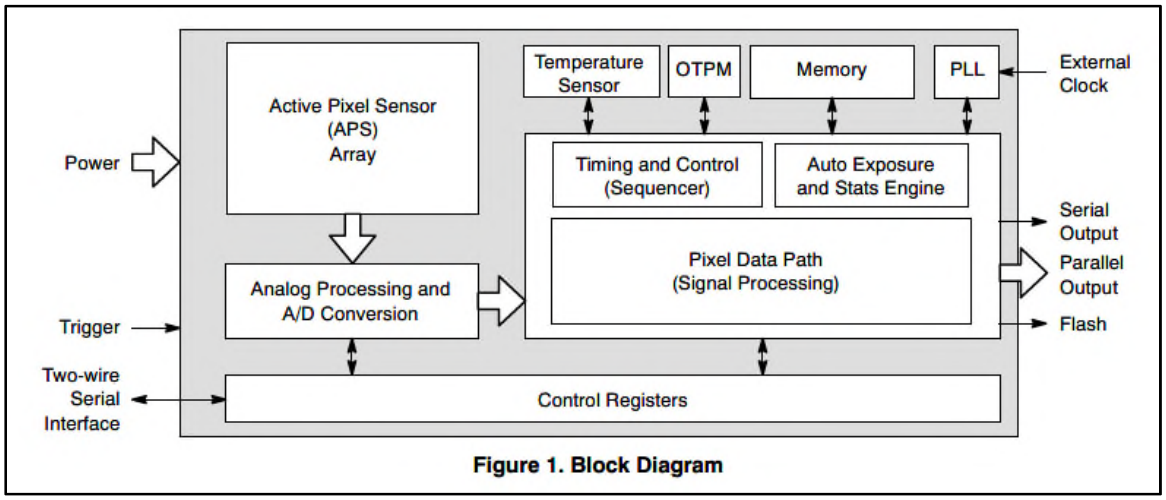
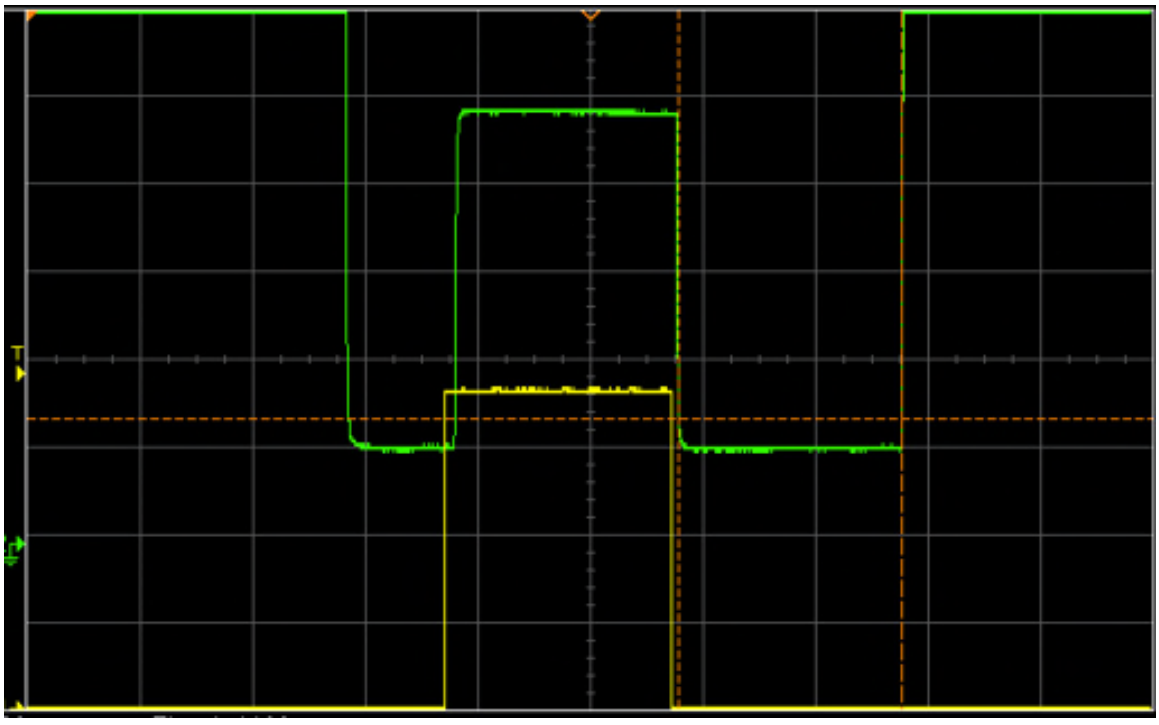
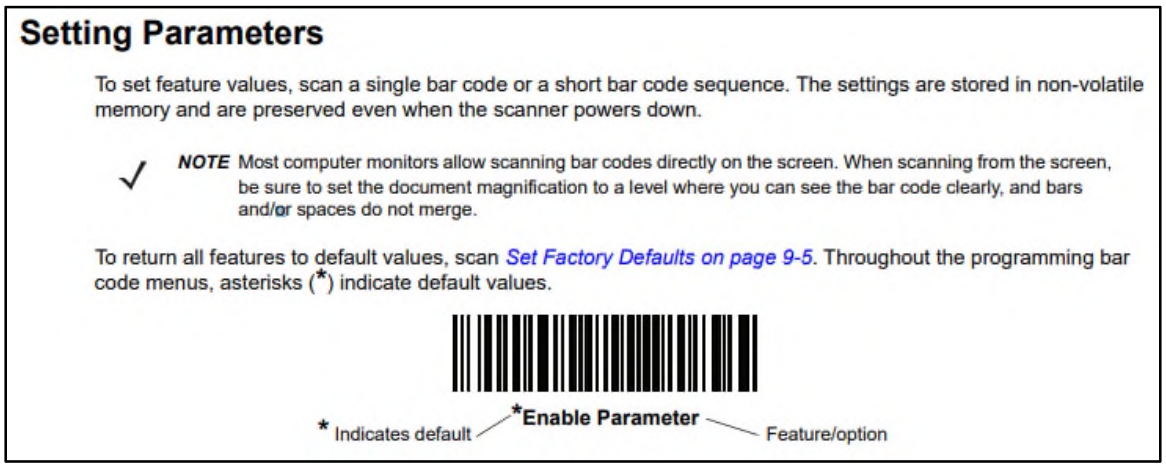


Figure 1. Block Diagram

Ex. AA (AR0134 Datasheet) at 3 (Figure 1). See also testing data for the SE4750, which includes an AR0134 image sensor that is also found in the DS8108, showing illumination (in green) and exposure (in yellow):

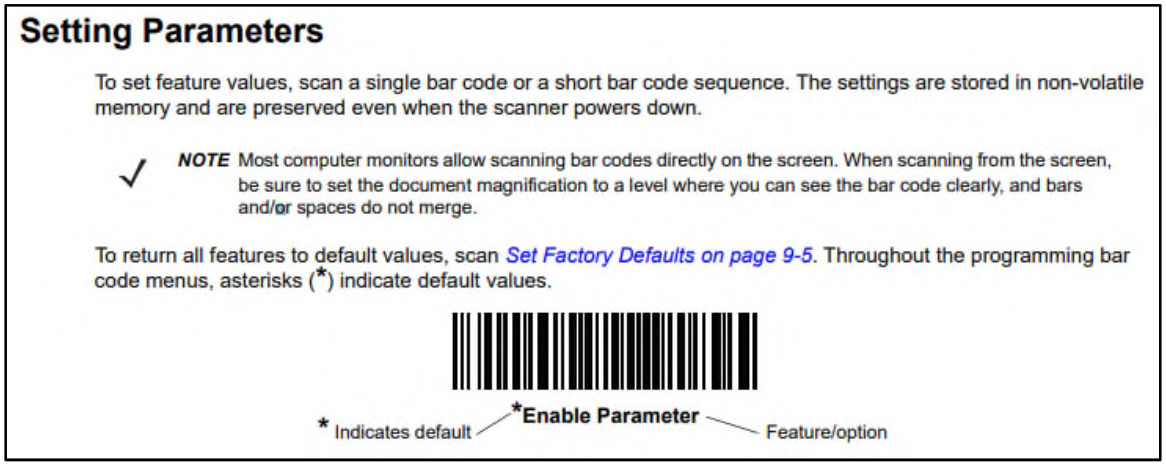


102. Zebra's DS8108 contains a non-transitory memory including computer program instructions:



Ex. EE (DS8108 Reference Guide) at 4-1; *see also, e.g., id.* at 5-6, 5-10, 6-1, 6-3, 7-1, 7-3, 8-1, 8-3, 9-1, 9-2, 10-1, 10-2, 11-1, 11-2, 12-1, 12-2, 13-4, 13-5.

103. The non-transitory memory and the computer program instructions in Zebra's DS8108 are configured to, when executed by the processor, cause the apparatus to search the image data collected in the global shutter mode for one or more markers indicative of a presence of at least one barcode symbol:



Ex. EE (DS8108 Reference Guide) at 4-1; *see also, e.g., id.* at 5-6, 5-10, 6-1, 6-3, 7-1, 7-3, 8-1, 8-3, 9-1, 9-2, 10-1, 10-2, 11-1, 11-2, 12-1, 12-2, 13-4, 13-5.

Image File Format Selector

Parameter # 304
SSI # F0h 30h

Scan one of the following bar codes to select an image format appropriate for the system (BMP, TIFF, or JPEG). The imager stores captured images in the selected format.

Ex. EE (DS8108 Reference Guide) at 10-16.

AR0134CS

Description

The AR0134CS from ON Semiconductor is a 1/3–inch 1.2 Mp CMOS digital image sensor with an active-pixel array of 1280 (H) x 960 (V). It is designed for low light performance and features a global shutter for accurate capture of moving scenes. It includes sophisticated camera functions such as auto exposure control, windowing, scaling, row skip mode, and both video and single frame modes. It is programmable through a simple two-wire serial interface. The AR0134CS produces extraordinarily clear, sharp digital pictures, and its ability to capture both continuous video and single frames makes it the perfect choice for a wide range of applications, including scanning and industrial inspection.

Ex. AA (AR0134 Datasheet) at 1.

DS8100 Series Handheld Imagers

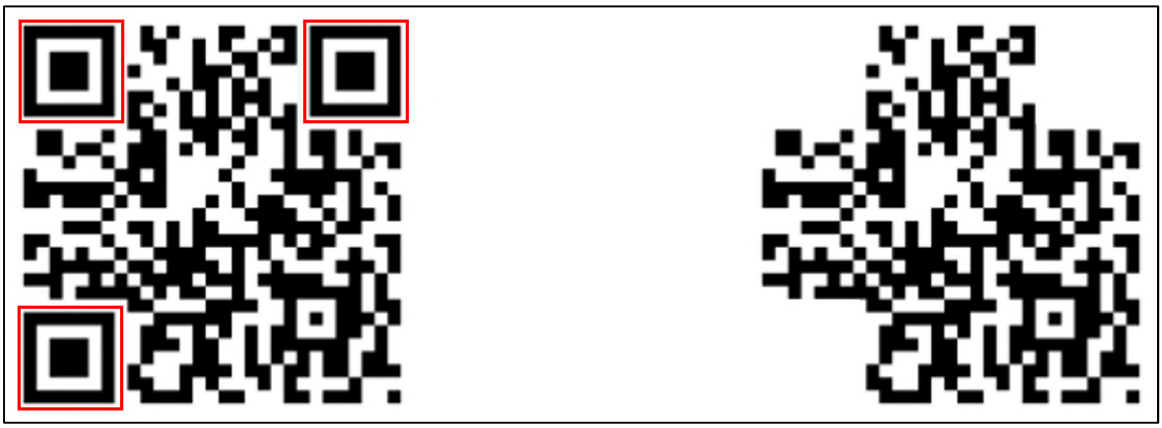
The ultimate in performance, innovation and manageability

Checkout is the last chance to leave your shoppers with a good impression — and the quality of the checkout experience is heavily dependent upon the performance of the scanner you choose. If cashiers need to scan barcodes multiple times or enter unreadable barcodes manually, your checkout lanes can back up quickly, resulting in long lines, long wait times and cashiers that need to focus on ringing up merchandise as quickly as possible instead of focusing on shoppers to provide a better checkout experience. Now, you can give every shopper the ultimate last impression with the DS8100 Series handheld imager. The DS8100 Series rises above conventional imagers, delivering unprecedented scanning performance on 1D and 2D barcodes, innovative productivity enhancing tools, including swappable power sources — a PowerPrecision+ battery or PowerCap™ capacitor[1] — plus unrivaled manageability tools to keep your scanners up, running and in the hands of your cashiers. Keep checkout lines moving and cashiers free to deliver a more personal checkout experience with the DS8100 Series — because when it comes to the checkout experience, only the best will do.

Ex. FF (DS8100 Datasheet) at 1.

104. To confirm that the DS8108 searches for markers, two 1D UPC-A barcodes as shown below were scanned by the DS8108, with the only difference between them being that the barcode on the left included the marker indicated by the red box while the marker was removed from the barcode on the barcode on the right. The DS8108 was able to decode the barcode on the left, but not the barcode on the right.

105. The same test was repeated for the 2D barcodes (QR codes) shown below, which again are identical except that the barcode on the left includes the three markers indicated by the red boxes while those markers were removed from the barcode on the right. Again, the DS8108 was able to decode the barcode on the left, but not the barcode on the right.



106. The non-transitory memory and the computer program instructions in Zebra's DS8108 are configured to, when executed by the processor, cause the apparatus to, in an instance in which at least one marker of the one or more markers is detected, decode the image data based on the at least one marker:

Introduction

You can program the scanner to perform various functions, or activate different features. This chapter describes symbology features and provides programming bar codes for selecting these features.

The scanner ships with the settings shown in *Table 11-1 on page 11-2* (also see *Appendix A, Standard Parameter Defaults* for all defaults). If the default values suit requirements, programming is not necessary.

Ex. EE (DS8108 Reference Guide) at 11-1.

Decode Mode

By default, when you press the trigger the imager attempts to locate and decode enabled bar codes within its field of view. The imager remains in this mode until it decodes a bar code or you release the trigger.

Ex. EE (DS8108 Reference Guide) at 10-4.

Table 11-1 *Symbology Parameter Defaults*

Parameter	Parameter Number [1]	SSI Number [2]	Default	Page Number
Enable/Disable All Code Types				*11-8*
1D Symbologies				
UPC/EAN/JAN				
UPC-A	1	01h	Enable	*11-9*
UPC-E	2	02h	Enable	*11-9*
UPC-E1	12	0Ch	Disable	*11-10*
EAN-8/JAN 8	4	04h	Enable	*11-10*
EAN-13/JAN 13	3	03h	Enable	*11-11*
Bookland EAN	83	53h	Disable	*11-11*
Bookland ISBN Format	576	F1h 40h	ISBN-10	*11-12*
ISSN EAN	617	F1h 69h	Disable	*11-13*

1. Parameter number decimal values are used for programming via RSM commands.
2. SSI number hex values are used for programming via SSI commands.

Ex. EE (DS8108 Reference Guide) at 11-2.

Decode Capabilities[5]	
1D	Code 39, Code 128, Code 93, Codabar/NW7, Code 11, MSI Plessey, UPC/EAN, I 2 of 5, Korean 3 of 5, GS1 DataBar, Base 32 (Italian Pharma)
2D	PDF417, Micro PDF417, Composite Codes, TLC-39, Aztec, DataMatrix, MaxiCode, QR Code, Micro QR, Chinese Sensible (Han Xin), Postal Codes, SecurPharm, DotCode, Dotted DataMatrix
Digimarc	Digital watermark technology

Ex. FF (DS8100 Datasheet) at 4.

107. Zebra also indirectly infringed and continues to indirectly infringe at least claim 1 of the ’269 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

108. On information and belief, Zebra had knowledge of or was willfully blind to the ’269 patent before Honeywell filed this suit. In fact, the Patent Office cited to U.S. Patent No. 7,568,628 and 8,733,660—parents to the ’269 patent—in office action rejections during the prosecution of U.S. Patent Nos. 7,815,120, 8,474,723, 8,902,353, and 9,792,477, which are patents assigned to Zebra’s wholly owned and controlled subsidiary, Symbol Technologies, Inc. *See* Ex. M–P. U.S. Patent Publication No. 2014/0204257—which issued as the ’269 patent—was also extensively discussed in the International Search Report for PCT/US2017/025920, which also listed every member of the ’269 patent’s family—including the ’269 patent. *See* Ex. Q. In addition, Zebra’s wholly owned and controlled subsidiary, Symbol Technologies, Inc., expressly listed U.S. Patent No. 7,568,628, 7,909,257, and 8,733,660—parents of the ’269 patent—in Information Disclosure Statements filed during the prosecution of U.S. Patent Nos. 8,998,089, 9,756,215, 10,142,531, 10,769,394, and 10,929,623. *See* Ex. R–V.

109. Zebra has induced and continues to induce infringement of the ’269 patent by providing information and instruction on using the Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities, *e.g.*, Ex. SS–TT (TC75 Selling Guide), VV (DS8100 Selling Guide); (ii) the instructions and information contained in Zebra’s product guides and instructional materials; *e.g.*, Ex. X–Z (TC75), EE–GG(DS8108); and (iii) instructional videos published by Zebra on YouTube, e.g., *TC75 Overview* (June 2, 2015), https://www.youtube.com/watch?v=HeyAVSJ3V1o (TC75); *Zebra DS8100: How to Set Up Your*

Scanner For Document Capture (Jan. 18, 2018), https://www.youtube.com/watch?v=0RzV1Fhl6q4&t=10s (DS8108). Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology. *See, e.g.*, Ex. QQ–XX.

110. Honeywell has consistently and continuously marked its products with the '269 patent since at least 2019. *See* Ex. CCC–EEE. And, upon information and belief, Zebra tracks Honeywell's products, including producing internal marketing materials directly comparing Zebra's products to Honeywell's products, including those consistently and continuously marked with the '269 patent. *See* Ex. QQ (TC52/TC57 Selling Guide); Ex. SS–TT (TC75 Selling Guide), Ex. UU (DS3600 Series Selling Guide); Ex. VV (DS8100 Selling Guide); Ex. XX (MC9300 Series Selling Guide).

111. Zebra contributes to infringement of the '269 patent by others by manufacturing, marketing, and selling the Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

112. Despite its knowledge of the '269 patent, Zebra infringed and continues to infringe the '269 patent. Accordingly, Zebra's infringement was willful.

113. As a result of Zebra's infringement of the '269 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

114. Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

115. Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

COUNT IV
INFRINGEMENT OF U.S. PATENT NO. 9,929,906

116. Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

117. The '906 patent is valid and enforceable.

118. Hand Held owns the entire right, title, and interest to the '906 patent.

119. Zebra has directly infringed and continues to directly infringe at least claim 1 of the '906 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that embody the inventions disclosed in the '906 patent, including Zebra's StageNow mobility management tool.

120. Zebra's StageNow mobility management tool for Zebra Android Mobile Computers provides a "centralized Enterprise Mobility Management (EMM) solution" that allows "any size organization to easily and remotely stage a handful or hundreds of Android devices with a quick scan of a barcode or tap on an NFC tag." Ex. HH (StageNow Fact Sheet) at 1. StageNow is part of Zebra's Mobility DNA architecture. *See id.* As Zebra explains:

> **Overview**
>
> The File Manager (FileMgr) allows an application to manage files on the device. For example, FileMgr permits an app to download a file from a server to the device, copy a file or folder from one area of the device to another and to delete files on the device. The File Manager also can extract files embedded within an XML document and download from the internet with or without basic authentication.

Ex. II (StageNow TechDocs) at 1.

121. The Zebra Mobile Computers that support StageNow include, at least: ET5X, MC18, MC32, MC33, MC33XX, MC40, MC67, MC92, MC9300, PS20, TC20, TC25, TC51,

TC52, TC55, TC56, TC57, TC70, TC70X, TC72X, TC75, TC75X, TC77X, TC8000, TC8300, VC80X, VC8300, and WT6X. *See* Ex. JJ (Zebra DNA Developer Portal). For example, the Zebra MC9300 Android product is an EIR terminal. StageNow is configured to build and transmit a reprogramming message to at least one symbol reading device from amongst the plurality of symbol reading devices for at least one of a configuration, re-configuration, and a system upgrade of the symbol reading device. *See id.*

122. StageNow also allows a desktop computer equipped with a wireless network interface card to act as a Wi-Fi hotspot for staging devices, thus enabling staging without requiring an external wireless network and reducing the number of barcodes and eliminating the need to reprint barcodes if a profile changes. *See* Ex. KK (StageNow Getting Started). The reprogramming record includes, for example, a binary file identifier for updating using an OS update zip file or OS update package containing a staging profile that contains a command to download content from a staging server. The reprogramming message may comprise a binary file comprising instructions to be executed by the at least one symbol reading device from amongst the plurality of symbol reading devices using an OS update zip file or OS update package containing a staging profile that contains a command to download content from a staging server. Ex. LL (StageNow Stage Client).

123. The reprogramming message may comprise software configuration parameters corresponding to the plurality of symbol reading devices such as AccessMgr, AnalyticsMgr, AppMgr, and Batch. Ex. MM (StageNow Xpert Mode). The reprogramming message may comprise a script file comprising a sequence of commands to be executed by the at least one symbol reading device from amongst the plurality of symbol reading devices, wherein the symbol

reading devices are configured to decode machine readable symbols comprising coded information. *See id.*

124. Zebra also indirectly infringed and continues to indirectly infringe at least claim 1 of the '906 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

125. Zebra has induced and continues to induce infringement of the '906 patent by providing information and instruction on using the Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities, *e.g.*, Ex. SS–TT (TC75 Selling Guide); (ii) the instructions and information contained in Zebra's product guides and instructional materials; *e.g.*, Ex. HH–MM (TC75); and (iii) instructional videos published by Zebra on YouTube, e.g., *Tips from our engineers–Staging Zebra devices with StageNow* (June 29, 2020), https://www.youtube.com/watch?v=bmXdMgEL3RE. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology. *See, e.g.*, Ex. QQ–XX.

126. Honeywell has consistently and continuously marked its products with the '906 patent since at least 2020. *See* Ex. DDD–EEE. And, upon information and belief, Zebra tracks Honeywell's products, including producing internal marketing materials directly comparing Zebra's products to Honeywell's products, including those consistently and continuously marked with the '906 patent. *See* Ex. QQ (TC52/TC57 Selling Guide); Ex. SS–TT (TC75 Selling Guide), Ex. UU (DS3600 Series Selling Guide); Ex. VV (DS8100 Selling Guide); Ex. XX (MC9300 Series Selling Guide).

127. Zebra contributes to infringement of the ’906 patent by others by manufacturing, marketing, and selling the Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

128. Despite its knowledge of the ’906 patent, Zebra infringed and continues to infringe the ’906 patent. Accordingly, Zebra’s infringement was willful.

129. As a result of Zebra’s infringement of the ’906 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra’s infringement will continue, resulting in further irreparable harm to Honeywell.

130. Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

131. Zebra’s unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

COUNT V
INFRINGEMENT OF U.S. PATENT NO. 10,171,767

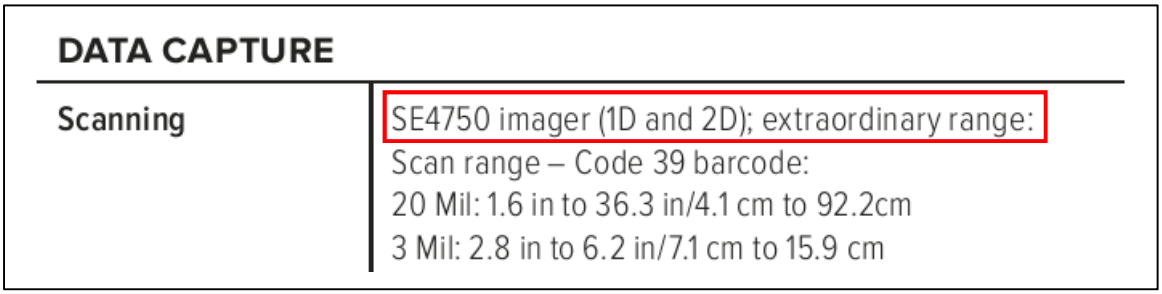
132. Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

133. The ’767 patent is valid and enforceable.

134. Hand Held owns the entire right, title, and interest to the ’767 patent.

135. Zebra has directly infringed and continues to directly infringe at least claim 1 of the ’767 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that embody the inventions disclosed in the ’767 patent, including Zebra’s TC75 and Zebra’s DS8108.

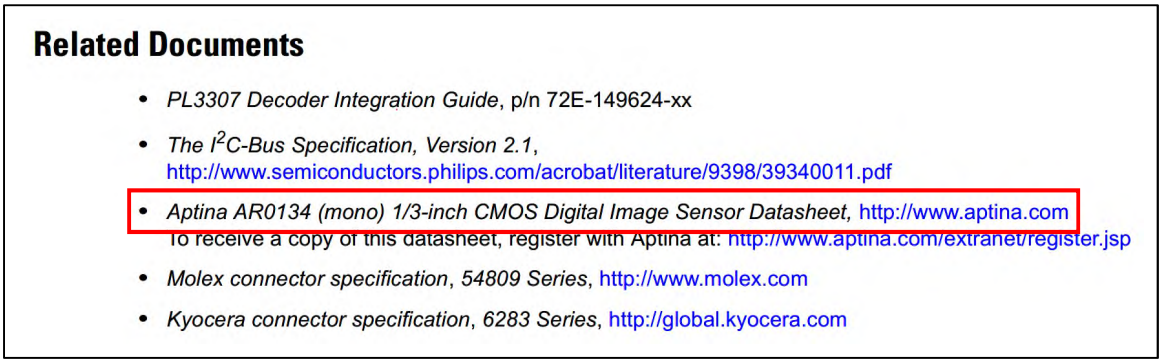
136. To the extent the preamble is limiting, Zebra's TC75 includes an SE4750 image reader that captures image data including 2D barcodes:



DATA CAPTURE	
Scanning	SE4750 imager (1D and 2D); extraordinary range: Scan range – Code 39 barcode: 20 Mil: 1.6 in to 36.3 in/4.1 cm to 92.2cm 3 Mil: 2.8 in to 6.2 in/7.1 cm to 15.9 cm

Ex. X (TC75 Specification Sheet) at 3.

137. Zebra's SE4750 comprises at least the Aptina AR0134 CMOS image sensor:



Related Documents

- *PL3307 Decoder Integration Guide*, p/n 72E-149624-xx
- *The I²C-Bus Specification, Version 2.1*, http://www.semiconductors.philips.com/acrobat/literature/9398/39340011.pdf
- *Aptina AR0134 (mono) 1/3-inch CMOS Digital Image Sensor Datasheet,* http://www.aptina.com To receive a copy of this datasheet, register with Aptina at: http://www.aptina.com/extranet/register.jsp
- *Molex connector specification*, *54809 Series*, http://www.molex.com
- *Kyocera connector specification*, *6283 Series*, http://global.kyocera.com

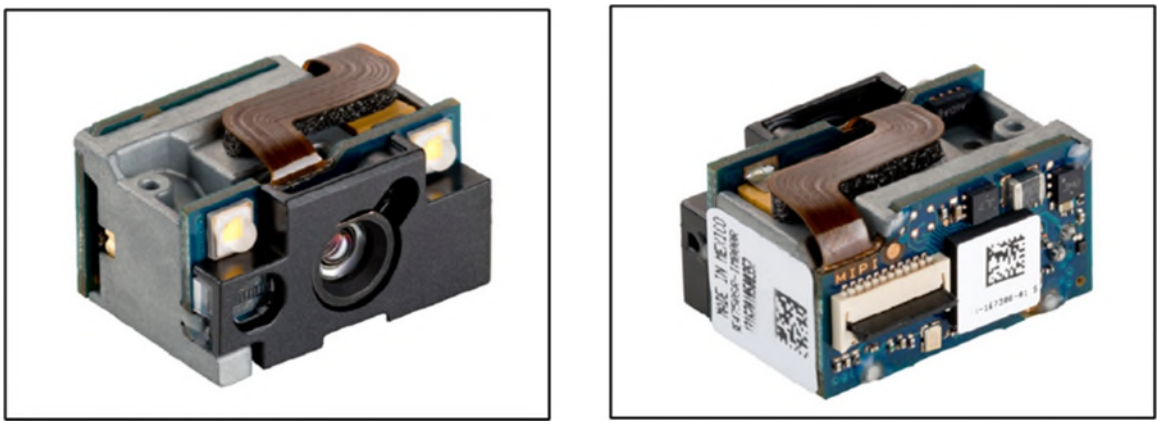
Ex. DD (SE4750 Integration Guide) at 12.

138. Zebra's SE4750, including the Aptina AR0134 CMOS image sensor, comprises a CMOS image sensor array comprising a plurality of pixels in a two-dimensional array:

Pixel Array Structure

The AR0134CS pixel array is configured as 1412 columns by 1028 rows, (see Figure 2). The dark pixels are optically black and are used internally to monitor black level. Of the right 108 columns, 64 are dark pixels used for row noise correction. Of the top 24 rows of pixels, 12 of the dark rows are used for black level correction. There are 1296 columns by 976 rows of optically active pixels. While the sensor's format is 1280 × 960, the additional active columns and active rows are included for use when horizontal or vertical mirrored readout is enabled, to allow readout to start on the same pixel. The pixel adjustment is always performed for monochrome or color versions. The active area is surrounded with optically transparent dummy pixels to improve image uniformity within the active area. Not all dummy pixels or barrier pixels can be read out.

Ex. AA (AR0134 Datasheet) at 4.



Ex. CC (SE4750/SE4757 Specification Sheet) at 1.

PERFORMANCE CHARACTERISTICS	
Sensor Resolution	1280 x 960 pixels
Field of View	SR: Horizontal: 48°, Vertical: 36.7° MR: Horizontal: 31°, Vertical: 23° DP: Horizontal: 31°, Vertical: 23°

Ex. CC (SE4750/SE4757 Specification Sheet) at 3.

139. Zebra's SE4750, including the Aptina AR0134 CMOS image sensor, is operable, in a global shutter mode, to collect image data from a target:

AR0134CS

Description

The AR0134CS from ON Semiconductor is a 1/3−inch 1.2 Mp CMOS digital image sensor with an active-pixel array of 1280 (H) x 960 (V). It is designed for low light performance and features a global shutter for accurate capture of moving scenes. It includes sophisticated camera functions such as auto exposure control, windowing, scaling, row skip mode, and both video and single frame modes. It is programmable through a simple two-wire serial interface. The AR0134CS produces extraordinarily clear, sharp digital pictures, and its ability to capture both continuous video and single frames makes it the perfect choice for a wide range of applications, including scanning and industrial inspection.

Ex. AA (AR0134 Datasheet) at 1.

140. Zebra's SE4750, including the Aptina AR0134 CMOS image sensor, enables the collection of image data in the form of a two-dimensional barcode:

Comprehensive data capture capabilities

Capture 1-D and 2-D bar codes in milliseconds, from high-resolution photos, to letter, legal, A4 and A5 documents that are fully searchable and editable.

Ex. CC (SE4750/SE4757 Specification Sheet) at 2.

> User interaction with the sensor is through the two-wire serial bus, which communicates with the array control, analog signal chain, and digital signal chain. The core of the sensor is a 1.2 Mp Active-Pixel Sensor array. The AR0134CS features global shutter technology for accurate capture of moving images. The exposure of the entire array is controlled by programming the integration time by register setting. All rows simultaneously integrate light prior to readout. Once a row has been read, the data from the columns is sequenced through an analog signal chain (providing offset correction and gain), and then through an analog-to-digital converter (ADC). The output from the ADC is a 12-bit value for each pixel in the array. The ADC output passes through a digital processing signal chain (which provides further data path corrections and applies digital gain). The pixel data are output at a rate of up to 74.25 Mp/s, in parallel to frame and line synchronization signals.

Ex. AA (AR0134 Datasheet) at 3.

141. Zebra's TC75 searches the image data for a two-dimensional barcode and decodes two-dimensional barcodes in the image data:

Imaging

The TC75 with an integrated imager has the following features:

- Omnidirectional reading of a variety of bar code symbologies, including the most popular linear, postal, PDF417, and 2D matrix code types.
- The ability to capture and download images to a host for a variety of imaging applications.
- Advanced intuitive laser aiming cross-hair and dot aiming for easy point-and-shoot operation.

The imager uses imaging technology to take a picture of a bar code, stores the resulting image in its memory, and executes state-of-the-art software decoding algorithms to extract the bar code data from the image.

Ex. Y (TC75 User Guide) at 109.

Table 23: Data Capture Supported Symbologies

Item	Description
1D Bar Codes	Code 128, EAN-8, EAN-13, GS1 DataBar Expanded, GS1 128, GS1 DataBar Coupon, UP-CA, Interleaved 2 of 5, UPC Coupon Code
2D Bar Codes	PDF-417, QR Code

Ex. Y (TC75 User Guide) at 192.

Operational Modes

The TC75 with an integrated imager supports two modes of operation, listed below. Activate each mode by pressing the Scan button.

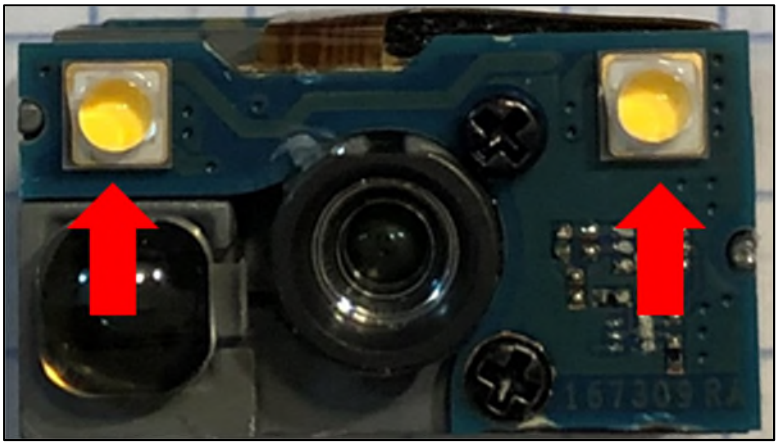
- **Decode Mode**: In this mode, the TC75 attempts to locate and decode enabled bar codes within its field of view. The imager remains in this mode as long as the user holds the scan button, or until it decodes a bar code.

  Note: To enable Pick List Mode, configure in DataWedge or set in an application using a API command.

- **Pick List Mode**: This mode allows the user to selectively decode a bar code when more than one bar code is in the TC75 's field of view. To accomplish this, move the aiming crosshair or dot over the required bar code to decode only this bar code. This feature is ideal for pick lists containing multiple bar codes and manufacturing or transport labels containing more than one bar code type (either 1D or 2D).

Ex. Y (TC75 User Guide) at 109.

142. Zebra's TC75, including Zebra's SE4750, comprises at least one illumination light source comprising two light emitting diodes (LEDs), shown in below as indicated by red arrows:



(red arrow annotations added).

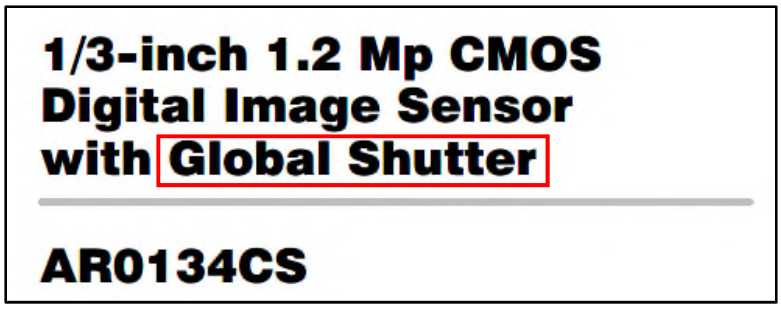
2D Imager Engine (SE4750-SR) Specifications	
Field of View	Horizontal - 48.0° Vertical - 36.7°
Image Resolution	1280 horizontal X 960 vertical pixels
Roll	360°
Pitch Angle	+/- 60° from normal
Skew Tolerance	+/- 60° from normal
Ambient Light	Sunlight: 10,000 ft. candles (107,639 lux)
Focal Distance	From front of engine: 17.7 cm (7.0 in.)
Laser Aiming Element	Visible Laser Diode (VLD): 655 nm +/- 10 nm Central Dot Optical Power: 0.6 mW (typical) Pattern Angle: 48.0º horizontal, 38.0º vertical
Illumination System	LEDs: Warm white LED Pattern Angle: 80° at 505 intensity

Ex. Y (TC75 User Guide) at 191.

143. Zebra's TC75, including Zebra's SE4750 scan engine, when in a global shutter mode, simultaneously exposes substantially all of the plurality of the pixels within the SE4750, which contains the Aptina AR0134 CMOS image sensor, in response to an exposure control timing pulse so as to enable the collection of image data including one and two-dimensional barcodes.

> User interaction with the sensor is through the two-wire serial bus, which communicates with the array control, analog signal chain, and digital signal chain. The core of the sensor is a 1.2 Mp Active-Pixel Sensor array. The AR0134CS features global shutter technology for accurate capture of moving images. The exposure of the entire array is controlled by programming the integration time by register setting. All rows simultaneously integrate light prior to readout. Once a row has been read, the data from the columns is sequenced through an analog signal chain (providing offset correction and gain), and then through an analog-to-digital converter (ADC). The output from the ADC is a 12-bit value for each pixel in the array. The ADC output passes through a digital processing signal chain (which provides further data path corrections and applies digital gain). The pixel data are output at a rate of up to 74.25 Mp/s, in parallel to frame and line synchronization signals.

Ex. AA (AR0134 Datasheet) at 3. See also, for example, the AR0134 Datasheet, which describes the AR0134/AR0135 as a "CMOS Digital Image Sensor with Global Shutter."



Ex. AA (AR0134 Datasheet) at 1. See also the AR0134 Datasheet that includes a block diagram of the architecture of the AR0134/AR0135 image sensor, including the timing module in communication with the CMOS based image sensor array.

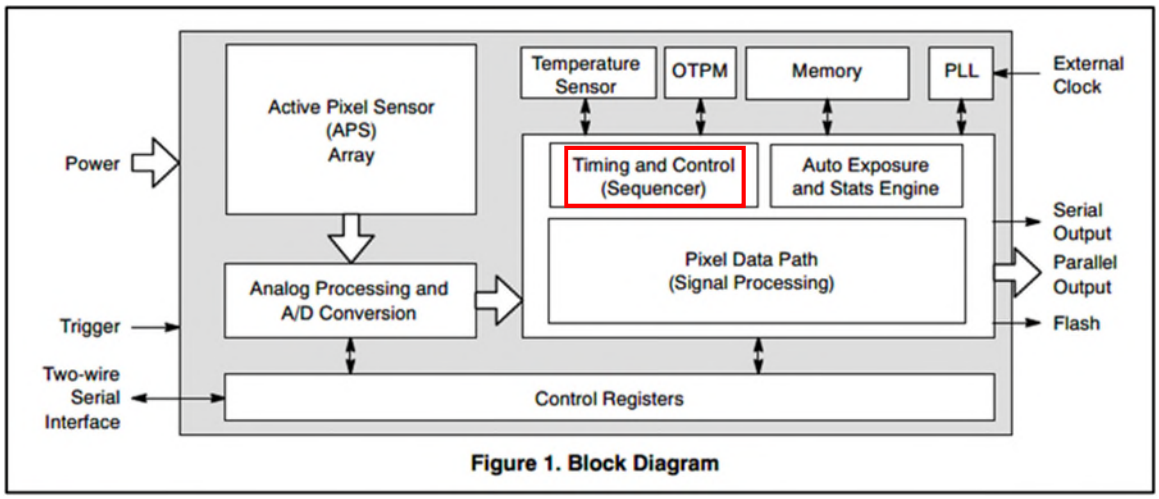


Figure 1. Block Diagram

Ex. AA (AR0134 Datasheet) at 3.

144. Zebra's TC75, including Zebra's SE4750, is configured to illuminate a 1D or 2D barcode using the illumination light source that includes two LEDs as discussed above. The illumination occurs in response to an illumination control timing pulse. See, for example, the AR0134 Datasheet that describes the AR0134 as including a "dedicated FLASH pin [that] can be programmed to control external LED or flash exposure illumination."

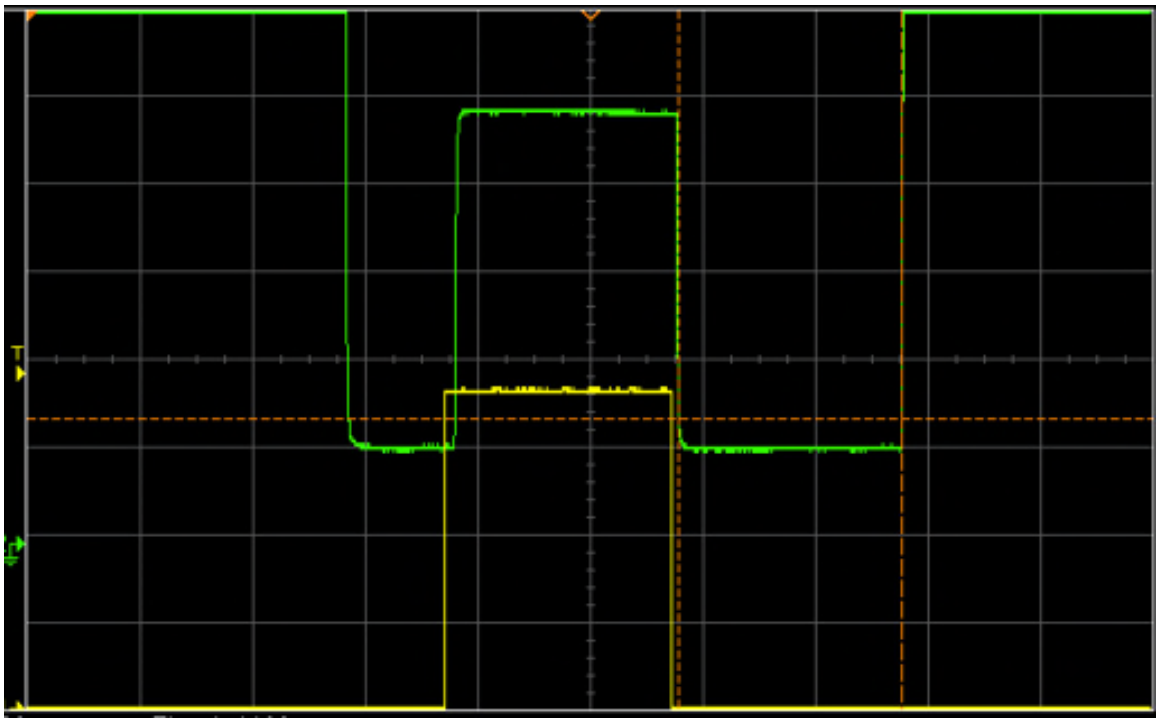
> FRAME_VALID and LINE_VALID signals are output on dedicated pins, along with a synchronized pixel clock. A dedicated FLASH pin can be programmed to control external LED or flash exposure illumination.

Ex. AA (AR0134 Datasheet) at 2. The AR0134 Developer Guide states that the Flash output signal indicates when exposure of the AR0134 imaging sensor takes place.

> **Exposure Indicator**
>
> The AR0134 provides an output pin, FLASH, to indicate when the exposure takes place. When R0x3046[8]is set, FLASH is HIGH during exposure. By using R0x3046[7], the polarity of the FLASH pin can be inverted.

Ex. BB (AR0134 Developer Guide) at 17.

See also testing data for the SE4750 showing illumination (in green) and exposure (in yellow):



145. Zebra's TC75, including Zebra's SE4750, is configured so the exposure control timing pulse and the illumination control timing pulse are coordinated by a control module such that the exposure and the illumination are interdependent. See, for example, the AR0134 Datasheet that describes the AR0134 as including a "dedicated FLASH pin [that] can be programmed to control external LED or flash exposure illumination."

> FRAME_VALID and LINE_VALID signals are output on dedicated pins, along with a synchronized pixel clock. A dedicated FLASH pin can be programmed to control external LED or flash exposure illumination.

Ex. AA (AR0134 Datasheet) at 2. As discussed above, the AR0134 Developer Guide states that the Flash output signal indicates when exposure of the AR0134 imaging sensor takes place.

> **Exposure Indicator**
>
> The AR0134 provides an output pin, FLASH, to indicate when the exposure takes place. When R0x3046[8]is set, FLASH is HIGH during exposure. By using R0x3046[7], the polarity of the FLASH pin can be inverted.

Ex. BB (AR0134 Developer Guide) at 17.

146. To the extent the preamble is limiting, Zebra's DS8108 is a barcode reading device that captures image data including 2D barcodes:

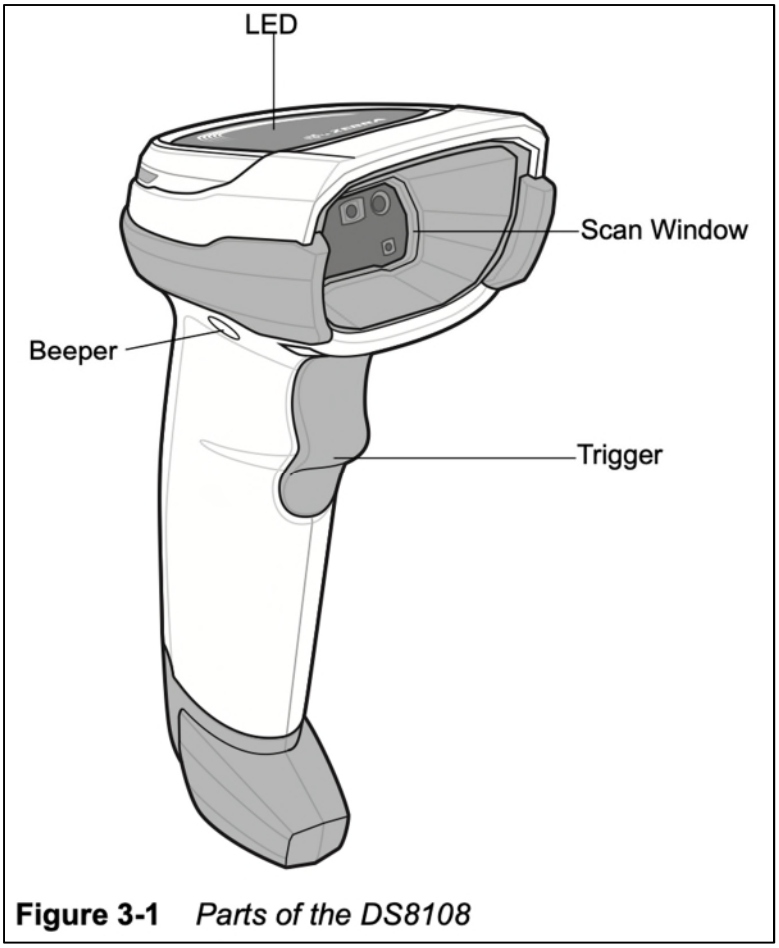


Figure 3-1 *Parts of the DS8108*

Ex. EE (DS8108 Reference Guide) at 35.

Performance Characteristics	
Light Source	Aiming Pattern: circular 617nm amber LED
Illumination	(2) 645nm red LEDs
Imager Field of View	48° H x 37° V nominal
Image Sensor	1,280 x 960 pixels
Minimum Print Contrast	16% minimum reflective difference
Skew/Pitch Roll Tolerance	+/- 60°; +/- 60°; 0-360°
Imaging Characteristics	
Graphics Format	Images can be exported as Bitmap, JPEG or TIFF
Image Quality	109 PPI on an A4 document
Minimum Element Resolution	Code 39 - 3.0 mil; Code 128 - 3.0 mil; Data Matrix - 6.0 mil; QR Code - 6.0 mil; PDF - 5.0 mil

Decode Capabilities[5]	
1D	Code 39, Code 128, Code 93, Codabar/NW7, Code 11, MSI Plessey, UPC/EAN, I 2 of 5, Korean 3 of 5, GS1 DataBar, Base 32 (Italian Pharma)
2D	PDF417, Micro PDF417, Composite Codes, TLC-39, Aztec, DataMatrix, MaxiCode, QR Code, Micro QR, Chinese Sensible (Han Xin), Postal Codes, SecurPharm, DotCode, Dotted DataMatrix
Digimarc	Digital watermark technology
Decode Ranges (Typical)[6]	
Symbology/Resolution	Near/Far
Code 39: 3 mil	2.2 in./5.6 cm to 5.0 in./12.7 cm
Code 39: 20 mil	0 in./0 cm to 36.8 in./93.5 cm
Code 128: 3 mil	2.6 in./6.6 cm to 4.5 in./11.4 cm
Code 128: 5 mil	1.6 in./4.1 cm to 8.4 in./21.3 cm
Code 128: 15 mil	0 in./0 cm to 27.1 in./68.8 cm
PDF 417: 5 mil	2.3 in./5.8 cm to 6.4 in./16.3 cm
PDF 417: 6.7 mil	1.8 in./4.6 cm to 8.5 in./21.6 cm
UPC: 13 mil (100%)	0 in./0 cm to 24.0 in./61.0 cm
Data Matrix: 7.5 mil	2.1 in./5.3 cm to 6.9 in./17.5 cm
Data Matrix: 10 mil	1.1 in./2.8 cm to 9.9 in./25.1 cm
QR: 20 mil	.1 in./.3 cm to 17.6 in./44.7 cm

Ex. FF (DS8100 Handheld Imager Datasheet) at 3, 4.

147. Zebra's DS8108 searches the image data collected in the global shutter mode for a two-dimensional barcode and to decode the two-dimensional barcode:

Hand-held Trigger Mode

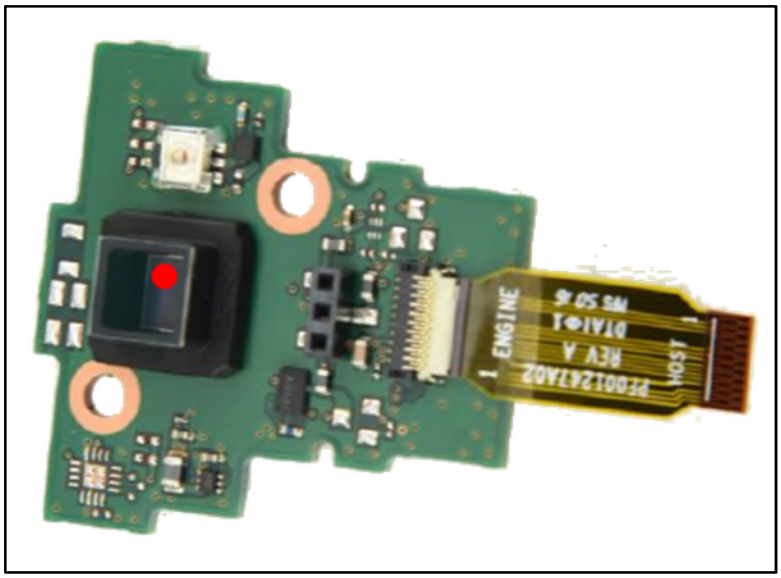
Parameter # 138
SSI # 8Ah

Scan one of the following bar codes to select a trigger mode for the scanner:

- **Standard (Level)** - A trigger press activates decode processing. Decode processing continues until the bar code decodes, you release the trigger, or the *Decode Session Timeout on page 10-24* occurs.
- **Presentation (Blink)** - The scanner activates decode processing when it detects a bar code in its field of view. After a period of non-use, the LEDs turn off until the scanner senses motion.
- ***Auto Aim** - The scanner projects the aiming pattern when lifted. A trigger press activates decode processing. After a period of inactivity the aiming pattern shuts off.

Ex. EE (DS8108 Reference Guide) at 160.

148. A teardown image of Zebra's DS8108 reveals an Aptina AR0134 CMOS image sensor, which is used in, for example, Zebra's SE4750:



149. Zebra's DS8108, including the Aptina AR0134 CMOS image sensor, comprises a CMOS image sensor array comprising a plurality of pixels in a two-dimensional array:

Pixel Array Structure

The AR0134CS pixel array is configured as 1412 columns by 1028 rows, (see Figure 2). The dark pixels are optically black and are used internally to monitor black level. Of the right 108 columns, 64 are dark pixels used for row noise correction. Of the top 24 rows of pixels, 12 of the dark rows are used for black level correction. There are 1296 columns by 976 rows of optically active pixels. While the sensor's format is 1280 × 960, the additional active columns and active rows are included for use when horizontal or vertical mirrored readout is enabled, to allow readout to start on the same pixel. The pixel adjustment is always performed for monochrome or color versions. The active area is surrounded with optically transparent dummy pixels to improve image uniformity within the active area. Not all dummy pixels or barrier pixels can be read out.

Ex. AA (AR0134 Data Sheet) at 4.

150. Zebra's DS8108, when in a global shutter mode, simultaneously exposes substantially all of the plurality of the pixels within Zebra's DS8108, which contains the Aptina AR0134 CMOS image sensor, in response to an exposure control timing pulse so as to enable the collection of image data including one and two-dimensional barcodes.

User interaction with the sensor is through the two-wire serial bus, which communicates with the array control, analog signal chain, and digital signal chain. The core of the sensor is a 1.2 Mp Active-Pixel Sensor array. The AR0134CS features global shutter technology for accurate capture of moving images. The exposure of the entire array is controlled by programming the integration time by register setting. All rows simultaneously integrate light prior to readout. Once a row has been read, the data from the columns is sequenced through an analog signal chain (providing offset correction and gain), and then through an analog-to-digital converter (ADC). The output from the ADC is a 12-bit value for each pixel in the array. The ADC output passes through a digital processing signal chain (which provides further data path corrections and applies digital gain). The pixel data are output at a rate of up to 74.25 Mp/s, in parallel to frame and line synchronization signals.

Ex. AA (AR0134 Datasheet) at 3.

151. Zebra's DS8108 comprises at least one illumination light source configured to illuminate at least a portion of the target barcode:

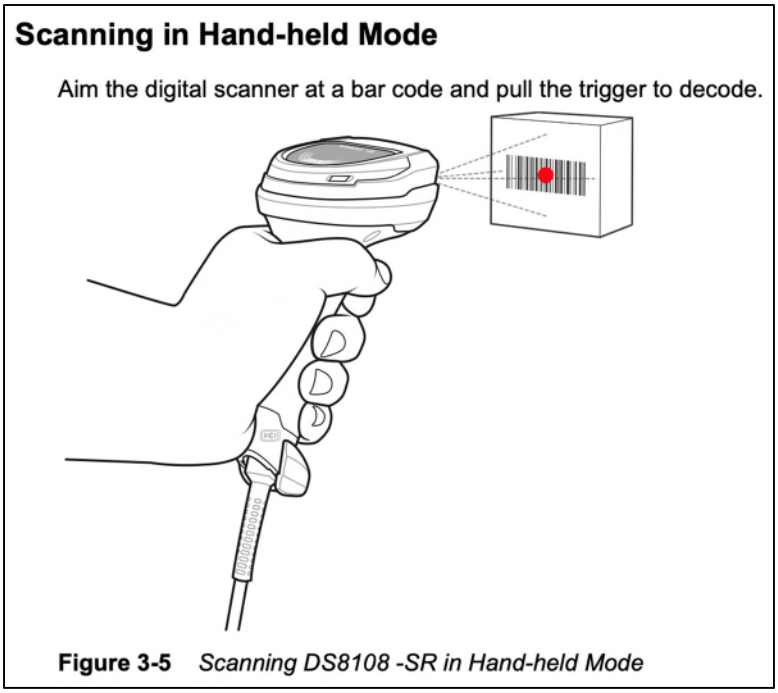


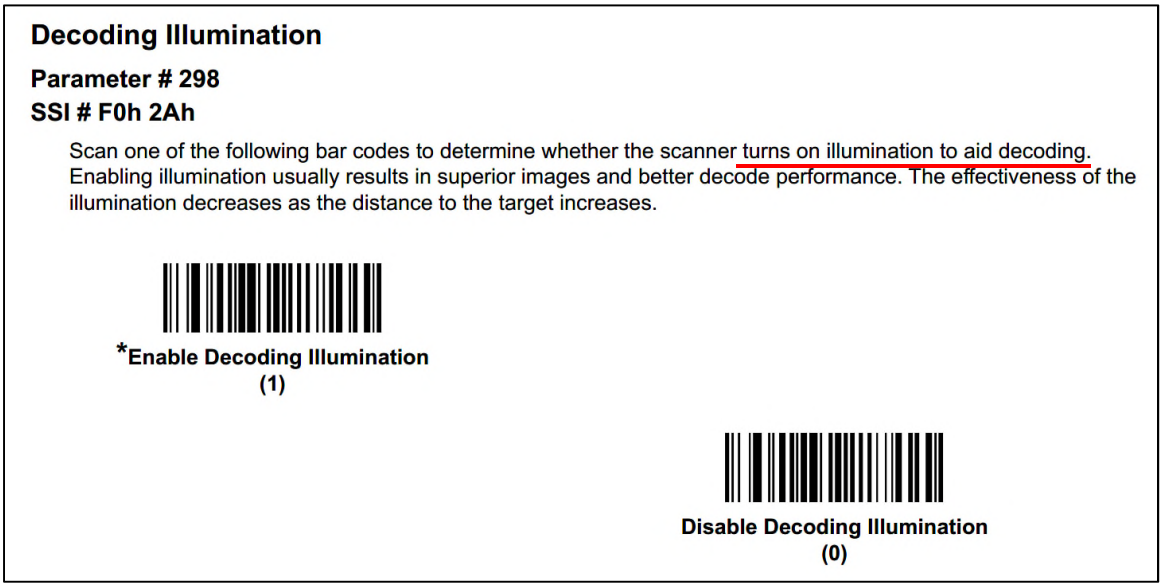
Figure 3-5 *Scanning DS8108 -SR in Hand-held Mode*

Ex. EE (DS8108 Reference Guide) at 41. See also the DS8100 Datasheet describing the performance characteristics of the DS8108 as including two (2) red LEDs for illumination.

Performance Characteristics	
Light Source	Aiming Pattern: circular 617nm amber LED
Illumination	(2) 645nm red LEDs
Imager Field of View	48° H x 37° V nominal
Image Sensor	1,280 x 960 pixels
Minimum Print Contrast	16% minimum reflective difference
Skew/Pitch Roll Tolerance	+/- 60°; +/- 60°; 0-360°

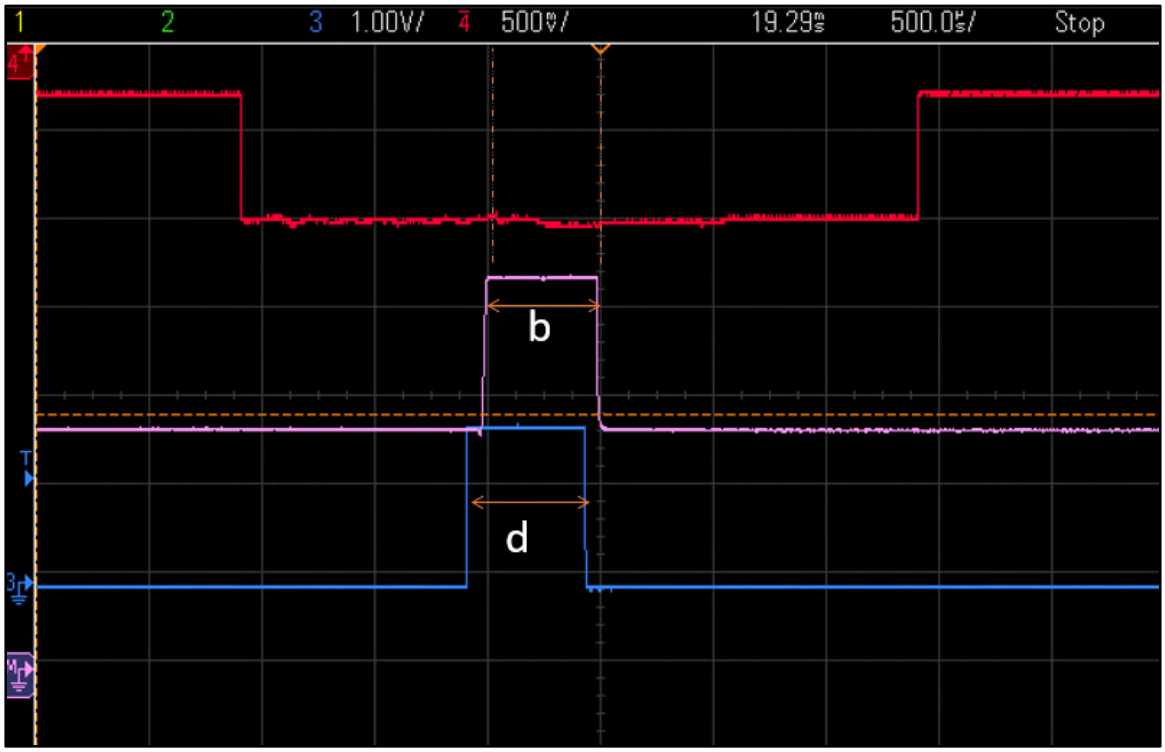
Ex. FF (DS8100 Handheld Imager Datasheet) at 3.

152. Zebra's DS8108 illuminates, using the illumination light source, a barcode in response to an illumination control timing pulse:



Ex. EE (DS8108 Reference Guide) at 171.

153. See also, for example, testing data for the SE4750, which includes an AR0134 image sensor that is also found in the DS8108, showing illumination (in purple) and exposure (in blue), where the CMOS image sensor pixels are simultaneously exposed to illumination.



154. Zebra's DS8108 is configured so the exposure control timing pulse and the illumination control timing pulse are coordinated by a control module such that the exposure and the illumination are interdependent as shown above.

155. Zebra also indirectly infringed and continues to indirectly infringe claim 1 of the '767 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

156. On information and belief, Zebra had knowledge of or was willfully blind to the '767 patent before Honeywell filed this suit. In fact, the Patent Office cited to U.S. Patent No. 7,568,628 and 8,733,660—parents to the '767 patent—in office action rejections during the prosecution of U.S. Patent Nos. 7,815,120, 8,474,723, 8,902,353, and 9,792,477, which are patents assigned to Zebra's wholly owned and controlled subsidiary, Symbol Technologies, Inc. *See* Ex. M–P. U.S. Patent Publication No. 2014/0204257—which issued as U.S. Patent No. 9,578,269, a parent of the '767 patent—was also cited in the International Search Report for

PCT/US2017/025920, an application owned by Zebra's wholly owned and controlled subsidiary, Symbol Technologies, Inc. *See* Ex. Q. In addition, Zebra's wholly owned and controlled subsidiary, Symbol Technologies, Inc., expressly listed U.S. Patent Nos. 7,568,628, 7,909,257, and 8,733,660—parents of the '767 patent—in Information Disclosure Statements filed during the prosecution of U.S. Patent Nos. 8,998,089, 9,756,215, 9,792,477, 10,142,531, 10,769,394, 10,929,623. *See* Ex. R–W.

157. Zebra has induced and continues to induce infringement of the '767 patent by providing information and instruction on using the Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities, *e.g.*, Ex. SS–TT (TC75 Selling Guide), VV (DS8100 Selling Guide); (ii) the instructions and information contained in Zebra's product guides and instructional materials; *e.g.*, Ex. X–Z (TC75), EE–GG(DS8108); and (iii) instructional videos published by Zebra on YouTube, e.g., *TC75 Overview* (June 2, 2015), https://www.youtube.com/watch?v=HeyAVSJ3V1o; *Zebra DS8100: How to Set Up Your Scanner For Document Capture* (Jan. 18, 2018), https://www.youtube.com/watch?v=0RzV1Fhl6q4&t=10s. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology. *See, e.g.*, Ex. QQ–XX.

158. Honeywell has consistently and continuously marked its products with the '767 patent since at least 2019. *See* Ex. CCC–EEE. And, upon information and belief, Zebra tracks Honeywell's products, including producing internal marketing materials directly comparing Zebra's products to Honeywell's products, including those consistently and continuously marked with the '767 patent. *See* Ex. QQ (TC52/TC57 Selling Guide); Ex. SS–TT (TC75 Selling Guide);

Ex. UU (DS3600 Series Selling Guide); Ex. VV (DS8100 Selling Guide); Ex. XX (MC9300 Series Selling Guide).

159. Zebra contributes to infringement of the '767 patent by others by manufacturing, marketing, and selling the Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

160. Despite its knowledge of the '767 patent, Zebra infringed and continues to infringe the '767 patent. Accordingly, Zebra's infringement was willful.

161. As a result of Zebra's infringement of the '767 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

162. Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

163. Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b), Honeywell demands a jury trial on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Honeywell respectfully requests this Court enter judgement in Honeywell's favor and grant the following relief:

A. Judgement that the Asserted Patents are valid and enforceable, and infringed by Zebra;

B. Compensatory damages no less than a reasonable royalty;

C. Pre- and post-judgement interest on all damages;

D. Judgment that the damages so adjudged be trebled in accordance with 35 U.S.C. § 284;

E. Declaring this case exceptional and awarding Honeywell its attorneys' fees and costs, under 35 U.S.C. § 285;

F. Granting a permanent injunction; and

G. Granting any other relief as the Court may deem just and proper.

Dated: September 29, 2021

Respectfully submitted,

/s/ *John Guaragna*

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*Pending Admission *Pro Hac Vice*

TABLE OF EXHIBITS

Exhibit	Description
A	Certified Copy of U.S. Patent No. 7,527,206
B	Certified Copy of U.S. Patent No. 10,171,767
C	Certified Copy of U.S. Patent No. 9,148,474
D	Certified Copy of U.S. Patent No. 9,578,269
E	Certified Copy of U.S. Patent No. 9,929,906
F	Zebra's Global Locations Webpage
G	Craig Etkin, *Zebra Technologies To Spend $2,354,400.00 To Occupy 26,160 Square Feet Of Space In Austin Texas*, INTELLIGENCE360 (Jan. 24, 2020)
H	Press Release, *Zebra To Acquire Xplore Technologies* (July 5, 2018)
I	Zebra's "About Us" Webpage
J	Zebra's Corporate Fact Sheet
K	Office Action Rejection of U.S. Patent App No. 11-739,888 (03-04-2009)
L	PCT/US2009/038330 Search Report And Written Opinion of International Searching Authority (12-24-2009)
M	Office Action Rejection of U.S. Patent No. 8,902,353 (07-14-2014)
N	Office Action Rejection of U.S. Patent No. 7,815,120 (03-02-2010)
O	Office Action Rejection of U.S. Patent No. 8,474,723 (09-07-2011)
P	Office Action Rejection To U.S. Patent No. 9,792,477 (08-10-2016)
Q	PCT/US2017/025920 Search Report And Written Opinion of International Searching Authority (2017-07-14)
R	Information Disclosure Statement Filed With US Patent No. 8,998,089 (2013-03-11)
S	Information Disclosure Statement Filed With U.S. Patent No. 9,756,215 (2017-03-07)
T	Information Disclosure Statement Filed With U.S. Patent No. 10,142,531 (2017-07-28)
U	Information Disclosure Statement Filed With U.S. Patent No. 10,769,394 (2018-03-22)
V	Information Disclosure Statement Filed With U.S. Patent No. 10,929,623 (2017-08-30)
W	Information Disclosure Statement Filed With U.S. Patent No. 9,792,477 (03-07-2017)
X	TC75 Specification Sheet
Y	TC75 User Guide
Z	TC70X/TC75X User Guide

TABLE OF EXHIBITS

Exhibit	Description
AA	AR0134 Datasheet
BB	AR0134 Developer Guide
CC	SE4750/SE4757 Specification Sheet
DD	SE4750 Integration Guide
EE	DS8108 Reference Guide
FF	DS8100 Datasheet
GG	DS8108 Quick Start Guide
HH	StageNow Fact Sheet
II	StageNow TechDocs
JJ	Zebra DNA Developer Portal
KK	StageNow Getting Started
LL	StageNow Stage Client
MM	StageNow Xpert Mode
NN	Zebra TC5X Accessories Guide
OO	TC52 User Guide
PP	TC52 Integrator Guide
QQ	Zebra TC52/TC57 Selling Guide (2019)
RR	MC3200 Selling Guide (2015)
SS	Zebra TC70/TC75 Selling Guide (2015)
TT	Zebra TC70/TC75 Selling Guide (2018)
UU	Zebra DS3600 Series Selling Guide (2016)
VV	Download Zebra DS8100 Selling Guide (2021)
WW	Zebra MC9200 Selling Guide (2016)
XX	Zebra MC9300 Selling Guide (2019)
YY	2013 Honeywell Patent Marking Website
ZZ	2014 Honeywell Patent Marking Website
AAA	2015 Honeywell Patent Marking Website

TABLE OF EXHIBITS

Exhibit	Description
BBB	2016 Honeywell Patent Marking Website
CCC	2019 Honeywell Patent Marking Website
DDD	2020 Honeywell Patent Marking Website
EEE	2021 Honeywell Patent Marking Website